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ELLIS - PAHSIMEROI

FINAL GRAZING ENVIRONMENTAL IMPACT STATEMENT

U.S. DEPARTMENT OF INTERIOR
BUREAU OF LAND MANAGEMENT
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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
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Dear Reader:

Enclosed for your review is the Final Ellis-Pahsimeroi Grazing Environmental Impact Statement. This statement was prepared by the Bureau of Land Management pursuant to Section 102 (2)(C) of the National Environmental Policy Act of 1969.

The statement describes and analyzes the economic, social, and environmental effects of proposed grazing management on 380,458 acres of public land in Central Idaho. Five alternatives to the proposal are also considered.

This statement does not include an entire reprint of the draft statement. Instead, this statement includes only those changes that are necessary to the Draft EIS, the public comments, and responses to the public comments received on the Draft EIS.

This document, used with the draft statement, which was distributed to the public on February 3, 1982, constitutes the Final Environmental Impact Statement.

This final statement is not a decision document; it merely analyzes the probable impacts to the human environment that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM's manpower and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs for the area. Decisions cannot be enacted before 30 days following the filing of the final statement with the Environmental Protection Agency and distribution to the public. A summary document that outlines the management direction for the Ellis-Pahsimeroi area will be prepared and made available as soon as a decision is reached; tentatively late 1982. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

Sincerely yours,

Jerry Goodman
District Manager, Acting

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DEPARTMENT OF THE INTERIOR

FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED RANGE MANAGEMENT PROGRAM

FOR THE

ELLIS - PAHSIMEROI AREA

PREPARED BY

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

Clair Whitlock, IDAHO BLM STATE DIRECTOR

Bureau of Land Management
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Denver, CO 80225

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ELLIS - PAHSIMEROI GRAZING
ENVIRONMENTAL IMPACT STATEMENT

( ) Draft (X) Final Environmental Impact Statement

1. Type of Action: (x) Administration ( ) Legislative

2. Responsible Agencies:
   a. Lead Agency: Department of the Interior, Bureau of Land Management
   b. Cooperating Agencies: None

3. Abstract: The Ellis - Pahsimeroi Grazing Environmental Impact Statement analyzes the effects of livestock grazing on 380,458 acres of public land in central Idaho. Six grazing management alternatives are presented for consideration and are analyzed in terms of their projected economic, social and environmental effects. Each alternative analyzes a different level of allocating the vegetative resource among competing uses.

This document will be used to determine the proper level of livestock grazing on the public lands, using the multiple use sustained-yield concept. Its contents exemplify the conflicting demands being placed on public lands throughout the West and the concessions necessary to achieve parity between resource needs and resource use. The range land management program selected for the Ellis-Pahsimeroi area will be based upon the analysis presented in this document.

4. Comments Have Been Requested and Received From:

See page 9 for listing of persons and/or agencies commenting.

5. Date Draft Statement Made Available to EPA and the Public:

Draft: February 3, 1982

Public Review of the Statement

There will be copies of this final environmental impact statement available for review at the following places.

Challis City Library
Challis, ID 83226

Custer County Agricultural Agent
Box 160
Challis, ID 83226

Salmon Public Library
Box 897
Salmon, ID 83467

Lemhi County Agricultural Agent
Box A
Salmon, ID 83467

Soil Conservation Service
Box 550
Salmon, ID 83467

BLM Offices

State Office
550 W. Fort Street
Boise, ID 83724

Coeur d'Alene District
Box 1889
Coeur d'Alene, ID 83814

Shoshone District
Box 2B
Shoshone, ID 83352

Boise District
230 Collins Road
Boise, ID 83702

Burley District
200 South Oakley Highway
Burley, ID 83318

Idaho Falls District
940 Lincoln Road
Idaho Falls, ID 83401

Salmon District
Box 430
Salmon, ID 83467

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PREFERRED ALTERNATIVE

When the Draft EIS was printed, the Proposed Action was the "Preferred Alternative". However, after consideration of the environmental impacts, costs, benefits and public comment the Proposed Action is no longer the "Preferred Alternative". Alternative 4 is now considered the "Preferred Alternative".

Forage allocation would be based on condition and trend data. The inventory data would be used as a baseline when condition and trend data indicate there is a need for adjustments. The following is a detailed description of Alternative 4.

Alternative 4 Maximizing Range Improvement Benefits

Under this alternative, initially, forage allocation would follow present stocking rates except on 7 of the 11 allotments identified below for intensive management. Those 3 allotments given increases under the Proposed Action would be allowed the same increases under this alternative. Initial stocking rate would be 27,435 AUMs.

Improvements as indicated in the Proposed Action involving vegetation manipulation, water developments, fencing and grazing systems would be scheduled for only those allotments in the intensive management category. These improvements would be on a five year time frame. Approximately nine other allotments would have these types of improvements implemented over 20 years as proposed in Alternative 1 - No Change. Selection of these nine allotments would be according to the BLM range management policy involving selective allotment management.

Four allotments, Camp Creek, Second Creek, Iron Creek, and Burnt Creek have issues identified concerning preference versus production and actual use versus licensed use. These problems would have a priority for being resolved. Well defined monitoring programs would be initiated on these four allotments to varify actual use, condition, and trend. At the end of five years these allotments would be stocked at their true carrying capacity. Burnt Creek riparian zone would be fenced.

Allotments were placed in the intensive management category if they possessed one or more of the following characteristics:

1) If 36 percent or more of allotment acreage was in poor condition regardless of trend;

2) If 10-35 percent of allotment acreage was in poor condition and in a downward trend,

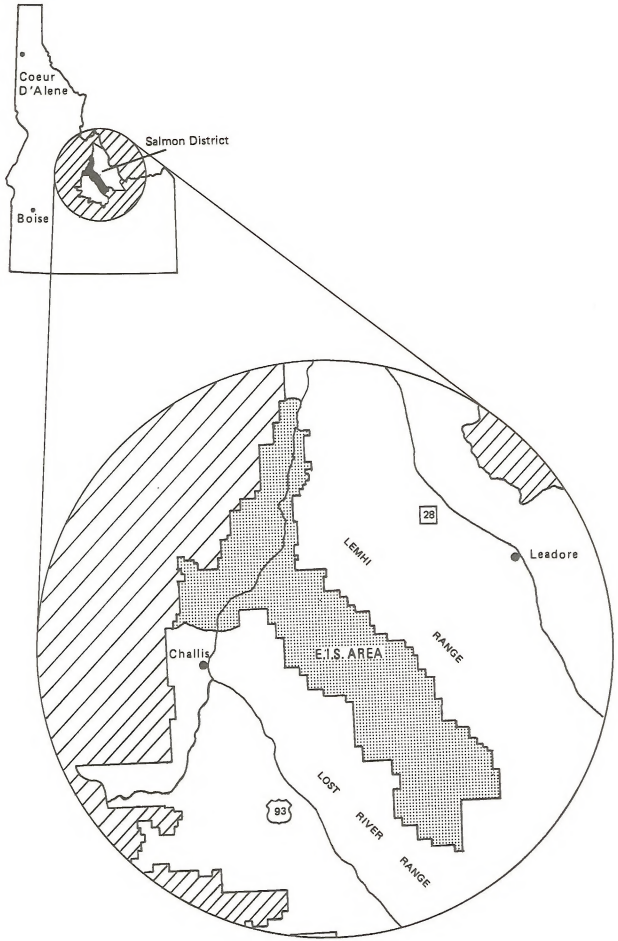
3) If the allotment had a seeding from which AUMs were derived.

Allotments falling into this intensive management category are the following:

	Initial Stocking Rate (AUMs)	Present Stocking Rate
1) Findley Basin	44	66
2) Allison Creek	403	655
3) Hat Creek	1366	1654
4) Falls Creek	545	545
5) Hamilton Seeding	60	70
6) Mahogany Creek	59	172
7) Patterson Creek	120	120
8) County Line	496	680
9) Lower Goldberg	196	196
10) Big Creek *	350	396
11) Bear Creek *	1301	1301

*These two were placed here because of their seedings. Other of the 11 allotments also have seedings from which AUMs were derived. However, these other allotments fell into the intensive management category either because of characteristic 1 or 2 above. The investment of a seeding necessitates that intensive management be practiced to assure the seeding's continued production.

Note: Standard Operating Procedures, Project Development and Design, Criteria, Monitoring Programs, Administration Procedures, Implementation Schedule and Conversions of kind of livestock as identified in the Proposed Action would be followed. (See pp. 2-8 through 2-14 of DEIS)


Coeur
D'Alene
Salmon District
Boise
28
LEMHI
RANGE
Leadore
Challis
E.I.S. AREA
93
LOST
RIVER
RANGE

SUMMARY

This Ellis - Pahsimeroi Grazing Environmental Impact Statement (EIS) analyzes the effects of livestock grazing on 380,458 acres of public land administered by the Bureau of Land Management, Salmon District, in central Idaho.

The EIS is being prepared between the recommendation and decision phases of the Salmon District's land-use planning process. That process has included detailed resource inventories, individual resource development plans, conflict analysis and multiple use recommendations. This EIS serves as an analytic instrument which will be used in deciding a course of action affecting the range land. The decision evolving from this study will determine final vegetation allocations among livestock, wildlife and non-consumptive uses such as watershed.

Issues and Controversy

The general public, special interest groups, other federal agencies and state agencies were consulted at regular intervals throughout the planning and EIS scoping process. In general, contributions from individuals and agencies were low level, except for ranching groups which expressed the most interest and made the most contributions of any of the groups. As a result of this consultation, the principal conflict related to livestock grazing surfaced as economic effects on ranchers versus allocation of forage.

The identification of these issues enabled the formulation of alternatives to be analyzed in the EIS. The basic difference between the Proposed Action and the various Alternatives lies in the number of AUMs allocated to livestock and wildlife and the extent and time frame of the range improvement program.

The major area of controversy centers around the initial adjustments in livestock AUMs to meet the determined available forage production for livestock.

Consequences of Proposed Action and Alternatives

The Proposed Action calls for an initial reduction of 4.6 percent from the current active grazing preference (from 27,979 AUMs to 26,689 AUMs). This would result in decreases in livestock allocations on 12 allotments, increases on 3 allotments, and an unchanged situation on 18 allotments. Wildlife would be allocated 2,751 AUMs and non-consumptive uses would receive 193,609 AUMs.

The Proposed Action also plans for 85 miles of pipeline, 89 troughs, 30 reservoirs, 69 miles of fence, 10,820 acres of new vegetation manipulation, 2,460 acres of vegetation manipulation maintenance, and implementation of grazing systems on 25 of the 33 allotments.

Within 20 years, a 22 percent increase in forage production would allow an increase in the livestock allocation to reach 35,016 AUMs and an average increase in big game wildlife populations of 42 percent over the current situation.

There are currently no allotments where watershed conditions are deteriorating. However, reductions in livestock grazing would cause improvement on 42 percent of the area and maintenance of condition on 58 percent of the area. In addition, aquatic wildlife and recreation would benefit, cultural resources would receive a 67 percent increase in trampling effects, more pressure, and visual resources would not be affected significantly. Although negatively impacted initially, at the end of 20 years the ecomonic and social conditions would have improved over the current situation.

Other management options are available including Alternative 1 (No Change), Alternative 2 (Prolonged Change), Alternative 3 (No Livestock Grazing), Alternative 4 (Maximizing Range Improvement Benefits) and Alternative 5 (Reduced Livestock).

Alternative 1 would result in a continuance of the present range program at the present rate. Livestock forage allocation would remain at 27,979 AUMs. The implementation of new grazing systems and range improvement projects would result in an expected 3 percent increase in forage production over the long-term. This would result in 28,818 AUMs available for livestock and an average increase in big game populations of 21 percent over the current number. Watershed conditions would improve on 42 percent of the area with 58 percent maintaining its present condition. Aquatic wildlife and recreation would accrue benefits; however, not to the extent of the Proposed Action. Cultural resources would continue to receive pressures from grazing and visual resources would not be significantly impacted. No change would occur to the economic or social conditions in the area.

Alternative 2 involves basically the same programs as the Proposed Action, only over a 20 year time frame of implementation instead of the 5 year time frame of the Proposed Action. Livestock allocations would not be changed from the current number. However, a 14 percent increase in forage production would allow for a corresponding increase in livestock AUMs and the same number of big game wildlife populations as Alternative 1 (No Change). Watershed condition, cultural resources, range improvements, visual resources, and recreation, would be affected the same as in the Proposed Action. Big game wildlife populations and aquatic wildlife would incur benefits the same as under the No Change Alternative. No change would occur initially in the economic conditions of the rancher groups affected. However, over the long-term, rancher income would increase resulting in the same net gain as the 5 year Proposed Action. Since reductions would not occur but economic long-term gains would be made, social well being would be better than the Proposed Action.

Alternative 3, although not a realistic alternative, is a requirement of NEPA. Without livestock grazing, a long-term 45-90 percent increase in production would result. Wildlife populations would respond by increasing an average of 43 percent and watershed conditions would improve on 80 percent of the area with no change on 20 percent of the area. Under this alternative as compared to other alternatives, aquatic wildlife would have the greatest benefits. The effects of livestock trampling on cultural resources would cease along with any related visual impacts. Recreation opportunities would be greatest under this alternative. Economic and social conditions would be drastically affected.

Alternative 4 is designed to concentrate vegetative manipulations and range improvements where the potential economic return is the greatest. Initial stocking rates would be 27,435 AUMs allocated for livestock grazing. Seven of the eleven allotments identified for intensive management would receive cuts, the three allotments identified in the Proposed Action for increases would receive increases, all remaining allotments would remain stocked at their present rate. Expected vegetative production increase would be 10 percent resulting in the same wildlife population increases as the Proposed Action. Range improvements listed in the Proposed Action would occur only on the 11 allotments placed in the intensive management category. Improvements on the remaining allotments would occur over a 20 year time frame and to approximately the same extent as Alternative 1. Watershed conditions would improve on 42 percent of the area and would be maintained on 58 percent of the area. Cultural resources would incur a 45 percent increase in trampling effects. Visual impacts would not be significantly affected. Recreation would be affected the same as the Proposed Action. Aquatic wildlife would benefit the same amount as Alternative 1. Initial economic and social impacts would be similar to the Proposed Action; long-term economic status and social well being would be improved above Alternative 1 and 5 but would be less than the remaining alternatives.

Alternative 5 reduces the initial livestock allocation to 22,778 AUMs (a 19 percent reduction from current active preference). Wildlife would be allocated 2,751 AUMs. After 20 years the expected production increase would be 26 percent. The same number of range improvements would be implemented as in the Proposed Action. Big game wildlife populations and aquatic wildlife would be affected the same as in the Proposed Action. Watershed condition would improve on 43 percent of the area with maintenance of present conditions on 57 percent of the area. Cultural resources, visual resources and recreation would be affected the same as in the Proposed Action. Economic status and social well being would, initially, be negatively affected the most of all the alternatives except Alternative 3. Long-term conditions would increase but not to the extent of the other alternatives (with the exception of Alternative 1 and 3).

As can be seen from the above discussion, the long-term effects of many of the Alternatives are not widely dissimilar (with the exception of Alternative 3). This is a reflection of the low magnitude of problems in the EIS area. The final course of action will mainly affect the initial and long-term economic impact on the ranching groups and the time frame within which improvement in the range resource will occur.

OTHER CONSIDERATIONS

Since printing of the DEIS, a land exchange was completed with the State of Idaho. AUMs will be changed on an allotment by allotment basis according to existing allocations made by the State of Idaho.

CONSULTATION AND COORDINATION IN PREPARATION OF THE FINAL EIS

A 60 day public comment period (January 29 through March 29, 1982) was provided on the Draft EIS to allow public review and comment. Approximately 300 copies of the Draft EIS were mailed to individuals, Federal, state, and local government agencies and to non-government organizations.

Notice of its availability was published in the Federal Register on February 8, 1982. In addition to the Federal Register notice, a statewide press release was issued from the BLM Idaho State Office. This news release was sent to approximately 85 statewide and regional television and radio stations and newspapers. The Federal Register and news releases also gave the date and place for the public hearing that was held on April 9, 1982 at the Salmon Public Library in Salmon, Idaho.

During the review period, 28 letters were received from Federal, state and local agencies; private organizations and interested citizens. Twelve individuals gave oral testimony at the public hearings. Four letters were received after the comment period. These four letters were evaluated for substantive comments but did not present new data. They are included in the official files at the Salmon District Office. A hearings officer presided over the hearings and testimony was taped. From the tapes, verbatim transcripts were prepared. The Pahsimeroi Area Manager and the EIS Core Team comprised the BLM panel at the hearing. A copy of the comments made at the hearing is shown under the Comments and Responses of this document.

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 1 in the Comments and Responses Section lists the letters that were received and the individuals who gave oral testimony at the public hearing.

Although all public input will be considered when management decisions for the Pahsimeroi Resource Area are made, only comments that presented new data, questioned the adequacy of the impact analysis and raised questions or issues bearing directly upon the Draft EIS were responded to in this Final EIS. The Text Change section indicates how the Draft EIS was changed to respond to these comments where necessary.

COMMENTS AND RESPONSES

All letters and public hearing comments were reviewed and considered in the preparation of the Final EIS. Table 1 lists the letters that were received and the individuals who gave oral testimony at the public hearing.

Although all public input will be considered when management decisions for the Pahsimeroi Resource Area are made, only comments that presented new data, question the adequacy of the impact analysis and raised questions are issues bearing directly upon the Draft EIS were responded to in this Final EIS. The Text Change section indicates how the Draft EIS was changed to respond to these comments where necessary.

Response to Letters

Each letter received during the review period is presented in full with a response(s), where appropriate, following the letter. Each substantive comment has been numbered. The response to each comment follows the letter with a corresponding number. The letters are presented in the order they were received.

Response to Public Hearing Testimony

As with each letter, the transcripts of the public comments is printed. Each comment requiring a response is numbered. The response to each comment is given a corresponding number. The response to each comment follows the transcript.

TABLE 1
RESPONSES TO DRAFT EIS

Comment Letters

Number	Person	Representing
1	Robert Loucks	Lemhi County Extionsion Service
2	Neil Rimby	SW Idaho R/E Center
3	Lee Stokes, Ph.D.	Idaho Department of Health & Welfare
4	Syd Dowton, Sr.	Self
5	Kenneth Sanders	Cooperative Extension Service
6	Joe Higbee	Self
7	L. Edwin Coate	Environmental Protection Agency
8	Ralph Hutchison	Self
9	Randy Capps	Lemhi Soil & Water Conservation Dist.
10	Gloria Mabbutt	Idaho State Clearing House
11	Jimmie Dowton	Lawson Creek Cattle Association
12	Andrew Opple	Lawson Creek Ranch
13	Amos Garrison, Jr.	Soil Conservation Service
14	J. Ratzloff	Self
15	Richard Winters	National Park Service
16	Eugene Hussey	Self
17	Mike Overacker, Jr.	Lemhi County Cattle and Horse Growers
18	E.L. Latimer	Self
19	Vaughn Higbee	Self
20	Bob & Leona Gibbs	Self
21	Clyde & Jan Phillips	Self
22	Robert Salter	Idaho Department of Fish and Game
23	Thomas Green	Idaho State Historical Society
24	Ken White	Self
25	Hubert & Lorraine Miller	Self
26	Elizabeth Hutchison	Self
27	Randy Capps	Self
28	J. Rex Tolman	Self

Late Letters in Salmon District Files

1	Sydney Dowton, Jr.	Self
2	Roy Ellis	Self
3	James Hawkins	Custer County Extension Service
4	L.A. Mehrhoff	Fish and Wildlife Service

Hearing Speakers

1	Bob Loucks	Lemhi County Extension Service
2	Eugene Hussey	Self
3	Richard McDaniel	Self
4	Martin Capps	Self
5	Dennis Trumble	Salmon Valley Chamber of Commerce
6	Rex Tolman	Self
7	Roy Ellis	Self
8	Jimmie Dowton	Lawson Creek Cattle Association
9	Don Grayot	Self
10	Ken White	Self
11	Bill Sager	Idaho Cattlemen's Association
12	Mike Overacker	Lemhi County Cattle & Horse Growers Association

Overview of Public Comments

1. Numerous public comments disagreed with the adequacy of the range inventory. These people felt that inventory data should not be used to allocate forage. The main problem arises when the inventory indicated certain allotments did not have adequate forage to support existing allocations, yet the allotments were in fair or good condition with static or upward trend.

   In response the EIS team feels that Alternatives 1, 2 and 4 deal directly with this concern. Alternatives 1 and 2 analyze impacts of existing allocations and Alternative 4 analyzes impacts of reductions on allotments which have problems with current range condition and downward trend.

2. Another major concern was raised on use of range suitability criteria. The comments stated that suitability (50% slope) should not be used, especially as a strict interpretation. In the Ellis-Pahsimeroi area, suitability was not used in its strict interpretation for allocation of forage in the Proposed Action.

   Ranchers were contacted and most of the allotments were ridden to map water availability, note areas of cattle use, gather information on needs of the allotment, and correlate the 50+% slopes on the slope map with 50+% slopes on the ground.

   The suitability information was mapped on overlays according to the criteria set forth in Washington Office Instruction Memo No. 78-134 dated March 17, 1978. These overlays were then shown and explained to the ranchers. Again their input was noted and recorded in the files or on aerial photos. This input was then available for the Area Manager to use at his discretion in modifying the Washington Office Instruciton Memo criteria.

   In addition, the watershed specialist was contacted to see how much of the area (by allotment) over 50% slope could be used without harming the watershed values. This data was also used to make the final allocation in the Proposed Action. Since Alternatives 1, 2, and 4 do not use the suitability criteria, it is felt the analysis of impacts of the use of suitability criteria is adequately handled to give the land manager enough data to make a decision.

3. Several comments were received that stated a desire for the BLM to prepare coordinated management plans. The BLM range management practices state that allotment management plans (AMPs) will be developed prior to changes in grazing systems and reductions in forage allocations. The AMPs will involve close coordination between the BLM and ranchers and where necessary Forest Service, Soil Conservation Service and Idaho Department of Fish and Game.

BOB LOUCKS:

Well, my name is Bob Loucks. I'm a professional natural resource manager, my training is in animal science and animal nutrition. I've also taken most of the range classes offered at the University of Idaho. I've been involved in professional natural resource management for approximately 15 years. I think tonight I'd like to start off and say, first I'd like to say thank you for giving us the opportunity to comment on this proposed action. I will begin by assuming that everyone acted in good faith, and made no charges that anyone did not act in good faith in this proposal.

I have objections to specific proposed actions on two particular allotments. I have studied Camp Creek Allotment and Iron Creek Allotments. I'd say the proposed suspension of 42% on Camp Creek and 34% on Iron Creek are wholly without merit. In both cases the condition of the allotment is satisfactory and the trend is static or improving. Both areas have areas of "poor" ecological condition range in Iron Creek Allotment are a result of poor distribution -- not overstocking.

I wrote a report to you as a result of a range reconnaisance on those two allotments on May 18, 1981. Or, Ken Sanders, Range Management Specialist, University of Idaho also wrote a report of the same reconnaissance June 15, 1981. Ralph Wells, District Conservationist, Lemhi Soil Conservation District, a Masters graduate in Range Management also wrote a similar report of the reconnaisance dated June 9, 1981. These reports agree, by different methods, that the action you proposed on these two allotments is unwarranted. I ask that these reports, that are in your files, be made a part of the official transcript of this hearing.

I subsequently spent another day horseback on the Iron Creek Allotment riding most of the Deer Creek part of the unit. This reconnaissance confirmed my initial opinion that numbers reductions were not warranted.

I have, my general objections, not to specific actions relate primarily to the procedural of the methods of how you arrived at your action. I object to the whole forage production-allocation scheme used. While some aspects of the scheme are useful estimators of certain parameters and may be of some value to professional range managers, the scheme as concocted by BLM is neither accurate nor precise, has no scientific foundation nor validity, and should be discarded.

I'd like to talk for a minute about sampling in general. Why do we sample? We sample because we can't afford to go out and measure the actual production. How accurate is sampling? For most natural resource sampling methods, we try to develop a method that is accurate within 20% of accurate, 80% of the time. That means 20% of the time we're out to lunch, but professional judgement brings us back to where we recognize we're out to lunch, or we hope it does.

What is the effect of pyramiding different sampling techniques such as the BLM has done with this scheme? Well, the effect is to compound the errors.

And, I'd like to make a little analogy. I weigh a lot of calves every year in the fall, and, of course, I'm interested in calf weights, now if we're interested in what is the calf production in a herd of cattle, what is the most accurate method of arriving at the production? So, obviously we go out and weigh every calf right? That's a census. Okay, or we could sample.

We could go out and get a random sample of 10 calves and from the data, we derive from 10 calves, we could arrive at what is a reasonable number of samples to take to estimate the production of all the calves in the herd. How accurate would that be? It would be within 20% of accuracy, 80% of the time, if we designed testing schemes to measure that.

Or we could go to a judgement sampling scheme in which we would arbitrarily divide the herd into size classes (big, little, medium), divide the size classes into condition classes (fat, average, thin) and make the condition classes into muscling classes (heavy, average, light), and weigh 3 individuals in each of the 27 classes, then would estimate the weight and then we would estimate how many individuals are in each of those classes. Multiply the estimated weight of individuals by the average weight of the 3 to reach a total weight for the class. Then we would add the estimated totals for each class to reach an estimate for the herd. How accurate is that sampling? We have no idea. We have no idea and there is no way to estimate it. And, I might add that your Denver Service Center when asked about the accuracy and precision of this scheme, replied, and this was last week, that they had no idea. Now if they have no idea, and they are the people that dreamed it up, then who in the world are we supposed to have any idea how accurate or precise it is?

We could do another thing. We could follow the same classing procedure as we used in the first example, but estimate the weight of 10 calves in each class, weigh 2 of the 10, then make correct all weights by the correlation between the estimated weights and the actual weights. We could put all of either b or c in a computer model and that we don't make errors in arithmetic. How accurate is that? It's no more accurate because we put it in the computer and the computer didn't make arithmetic errors, that it was when we began, because the error is in the estimates.

So, I've addressed only part of your production estimate. I haven't looked at other parts, which are percentage of grasses, percentage of forbs, percentage of perennial forbs, percentage of shrubs, I haven't even talked about the errors in the allocation scheme.

Particular parts of your procedure, habitat types or range sites - the concept has some value, we all recognize that; however, you always must remember that vegetation represents what is called a varying continuum. What delimits the boundaries of if given plant community? And you know as professional land managers, nothing. Nothing. There's nothing out there

on the ground that we can go out and draw a line and say "On ho, right here I've got three tip sage/bluebunch wheatgrass, and over here I have big sage/bluebunch wheatgrass. We can't do that; it's impossible. If we can't do it on the ground, then how can we do it on a map and estimate so precisely that we can get to 749 AUM's in this allotment. It cannot be done. It's impossible.

Okay, ecological condition. Again we're speaking of a continuum and we speak of plant communities. No one can precisely assign boundaries to any condition class. Also, I don't recognize (the ecological) condition and value for a given use or multiple uses may not be synonymous. That is, a sub-climax serotype (fair or good ecological condition) may be of higher useful forage production more vigorous that climax community. Suitability Classification -- the whole concept would be a bad joke if some people didn't believe in it. Suitable range equals the range livestock will use without damage to the soil and vegetation. What difference does it make? What is suitable range? As a practicable matter, it doesn't make any difference. When I learned range management they told me, they said, manage the range that's accessible, and the range that isn't will take care of itself. I don't think the principle has changed.

Proper use factors. We all recognize there's a place for proper use factors in land management, and that place is in season-long grazing situations. Continuous, so called continuous grazing situations. Whenever we go to refer to a rest-rotation grazing situation, and the "Bible", of course, written by Gus Hormay. And, Gus says we do not use proper use factors, and I think we should all recognize that.

So, what do I offer as an alternative? I say that stocking rate should be based on historical use and adjusted for condition and trend. If the condition of the range is satisfactory, if the trend is static or improving, then the stocking rate acceptable. We have no justification for making reductions in stocking rate if that situation occurs.

Suspended AUM's-should be suspended for an agreed time period while scheduled improvements occur. I'm not saying that there are not allotments here that do need some suspension. I'd be the last person to say that, and I haven't looked at all the allotments. I'm arguing about the ones I have looked at.

Given the current economic climate, it is highly unlikely that BLM will get $610 thousand to spend on range improvements in this area, especially, I calculated it at $104,444/AUM. BLM should try to work with operators, such as it has done with Rex Tolman to reduce the cost of range improvements. I think as a practicable matter, the only viable choices of the alternatives offered are Alternative 1 and Alternative 2. Thank you, can I answer any questions?

EUGENE G. HUSSEY:

My name is Eugene G. Hussey, I'm on the Iron Creek Allotment, I have no college degrees in anything. I was born on the place in 1920. My father bought it in 1916, and it assembled some of the use, the history of the use on this allotment since about the turn of the century.

The Snowp Estate turned out 2500 head of cattle in the teens and early twenties between Rattlesnake and Nat Creek. The Shoup turned out 500 head of cattle from my upper place on Iron Creek, in the late '20's and early '30's from their Iron Creek Ranch, that's the one I own up the creek. The turnout date at that time was usually from the 20th of May to the 1st of April. The Iron Creek/Deer Creek Allotments, or drainage, just Iron Creek and Deer Creek not the allotment, Frank Hussey, between the '20's through the '50's, wintered 60 to 100 head of horses. Dave White wintered 30-40 head of horses between the '30's and the '40's. Frank Hussey, the '20's through the '50's, ran a 100 to 200 head of cattle, and 100 to 200 head of sheep. Joe Chod ran 200 head of sheep. Benjamin ran approximately 70 head of cows in the '40's up Deer Creek. In the Rattlesnake Allotment, Charlie Capps, in the 1920's to the 1940's, wintered 50 to 100 head of horses, and turned out 150 to 170 head of cows each year. - Mike Loney, through the '50's, estimated approximately 100 head of horses on the Rattlesnake/Deer Creek ridge, plus 150 more head of cows. Turnout dates were the first of April on most of this terrain, except in 1943, it was actually the 5th of April; and from 1943 through 1960, the 16th of April.

Now the trespass that we've had on Deer Creek/Rattlesnake area the last 13 years since I've had that part of the allotment. Three years Jack Imahundra ran 60 or more head of cows, and 60 to 100 head of cows, and 20-30 head of horses for three years. Chuck Wilmore has had 20-60 head of horses the last seven years and no fences; now I don't know, they haven't been able to get them fenced.

The last 20 years, 1200 AUM's has been permitted and the grazing capacity by the BLM surveys in 1958 was 1600 AUM's on that allotment. Now their survey shows less, or only about 500 AUM's - with all this use, no erosion shows in that allotment. If you rolled my range out flat, 3½ or more actual grazing area is there that you show on your map. The only part of my range that should be put under rest-rotation is that used after the first of June, because anything I use before that, you won't even know I've been on it. And to have rest-rotation, I have requested several times two miles of fence to help solve the poor range area in the north side of Deer Creek next to the forest. I requested permission to put up 40 rod of temporary electric fence last year and was denied.

As far as the critical deer range as listed in my range, to me in the lifetime we've spent there, the critical deer range is from - to the west fork of Iron Creek. Therefore we have one--almost a solid section--of bitterbrush, and in Badger Basin, which is on the Forest, we have there at least a half a section of solid bitterbrush. Deer does not leave that until they are snowed out, usually it's after the first of the year. They come down onto the BLM and usually are there for after the first of the year for about 30 days to 6 weeks at the most, and that is on your rocky points where there is sahogany, and on the south slope and there is plenty of bunchgrass there if you look at the range. They have never had to feed deer at Iron Creek, they didn't have to feed them this year. When all this was on, there was 10 deer where there was one right now, and I don't believe that we have 100 or 150 deer in the Iron Creek/Rattlesnake area. And that's all I had wrote down.

RICHARD MCDANIEL:

Richard M. McDaniel, I live at Ellis.

I feel the EIS was not written with the ranchers in mind. I don't feel it was worth much.

Let me read about the Allison Creek Allotment. I like wildlife, but 60 or 70 antelope in my field is kind of quite a few. Wildlife has identified critical winter range for deer, antelope, bighorn sheep in the Allison Creek Allotment. Also there is deer winter range, antelope summer range, migrant route, bighorn sheep summer/winter range, lambing area. The allotment is within the Wilderness Inventory unit which is recommended to drop from the further wilderness study by the Senate Director. This decision has not been appealed, so that the area has to remain under interim management until the IBLA makes a decision on the appeal. The area has been recommended by watershed, cultural, and recreation and wildlife aquatic to the management of the ACEC. Any development within this allotment may have impact on these values. The first question I have was: How many deer and antelope graze on private land? I think this has never been taken into consideration either. At the BLM Advisory Board meeting, there was quite alot of discussion on the antelope in this allotment. We felt that they certainly should be some of them removed for this purpose of the mountain that is between Polson Creek and Hatch's up there by Ennis Gulch.

Also, the members of the Board felt that the discussion on the 50% unsuitable question was in question. It is felt by some members of the Board that cattle often graze on slopes of more than 50% if the grass is green, it is better than it does on the gentle slopes. I feel also that the BLM Suitability Criteria should be thrown out or be less restrictive when steep slopes have been historically grazed without causing apparent damage. Mr. Jerry Wilson made the statement in the past that there was no erosion on the Ellis-Pahsimerol area. One thing more, how do people get on top of a hill? By a road or a trail. So do cattle or deer or everything else.

There is one thing that should be in the EIS says: The U.S. Department recently proposed change in the regulation governing farmers and ranchers who graze their stock on public land. According to the Interior, the proposed amendment would eliminate about 20% of the volume of the Interior's existing grazing regulations and provide incentives to livestock producers to improve the condition of the federal range. The proposed amendment would permit Interior Bureau of Land Management to allocate increased grazing privileges to producers who contribute to the range condition to increase the amount of forage available for livestock. The Interior said the amendment would also provide a more effective deterrent. This would be to people who are grazing on public land without a license. That's in Mr. Hussey's case, it sounds like they need some things done there.

Now as we know, the economic part of the factor is the fact that ranchers are going to be responsible for maintaining/taking care of their allotments; like watertroughs, fencing and so forth. When this is made, he

will have the incentive to do work. It is better to work with someone than just to tell him what to do. As per Mr. Hatch mentioned in his allotment one time that the AUMs are not being entirely used because when his cows come off the National Forest in the fall, they pass through the BLM, but do not stay to graze there for long. Rex agreed that happens sometimes; that the AUMs should probably be readjusted to reflect this problem. If a person does not use his fall permit, why should it be a problem? I feel we need the old grass in the spring. I am one of those who are getting 120 AUM's cut in the fall use, for not using it. I am trying to improve my range; but most of all, no one has ever rode my range when they don't even know where the range improvements are.

Mr. Coates asked Rex about the range survey when it was taken. Rex said 1986; it showed 10% difference. He didn't say whether it was up or down; but a 10% difference in that many years can't be too bad. I feel every rancher should have had someone ride in his range, then work out a plan in the allotment. If the range is in such bad shape, why did the burn on the few burns we had last year take up the side hill? The grass must have been there. Also, the Advisory Board made a resolution that there would be no increase in game until there was an increase in cattle.

In the Visual Resource Manager--of course I live in the Salmon River corridor, and that seems to be kind of a bad place to live at the present time--everybody looks at it as a scenic place to be, but nobody wants to help you make a living at it.

When we talk about stream channel stability, I know from experience of living on the river, it surely isn't cows that tromp them banks off, when you have high water, that stability moves. I think that's the way it is on alot of some of those ranges where you have those flash floods or cloud bursts. It's not the cattle that do that.

I agree upon the first two proposals more than any of the others. We talk about air and quality, water, air and quality, you might find a cow pile out on the bank of the river, along the streams, but when people get through, they leave everything behind.

You talk about social conditions. I think this goes back to the fact that those people who are taking cuts on their range. How many working people can take a cut in their pay and not know about it? That is the way with the rancher or the farmer.

Time is at hand for each person who is non-productive to find out where his food is coming from. It is also a time to find out a way to help, not hinder, the food producer. The trouble is going on to Poland today because the fact that they are out of food. The food producing people are not working anymore. Think about it, it is real today. In China, 80% of the people work on farms and produce their food. Would we rather live in a free land, or would we rather--or would we want the BLM telling us what to do forever? Thank you.

MARTIN CAPPS:

My name is Martin Capps and I'm in the Camp Creek Allotment.

Mr. Chairman: I would like to preface my remarks; there are some dedicated people in the government agencies and I want to thank them for their work and support. However, when we speak of agencies we lump all employees together as the agencies classify us as permittees.

A great deal of money and effort was put into the Grazing Impact Statement. What bothers me, most of it is based on assumption and theory, with little fact involved. Also, it is written with a very biased theme. The grazing by privately owned livestock is the cause for all problems on BLM land. Trampling, soil movement, erosion, damage to cultural resources, visual resource would be affected, impacts on prehistoric resource, damage to riparian zones: all of these are blamed on livestock.

In the Camp Creek area, cattle and horses have grazed since 1886 and some were probably in the area before that date. At least 1,500 head have been trailed through and grazed through this area in earlier years. One of the main cowboy camps was at one of the springs in this area and an old drift fence still stands in part, that was built by the cowboys to keep their saddle horses from straying back to the old Sheep Ranch.

The present allotment allows 93 head of cattle for 30 days in the spring and 25 horses for 60 days, for a total of 201 AUM's.

Since we are a small operation, we are on the borderline of staying in the cattle business. The use of the range is the only survival for this operation. When we are pushed into a survival situation, we are going to do everything possible to survive. That is why I am here!

The directives from the higher echelon of the agency: there must be a reduction of cattle numbers. We are here to present some facts and that there is no justification for this reduction of grazing in this allotment.

In the past there was another permittee in this same area with 76 head of cattle and that has been eliminated.

Regardless of suggested range management, improvements, range condition or upward trend of the range; the proposal is to reduce cattle numbers. By the arbitrary suitability criteria employed 57% of the range is unsuitable for livestock grazing by a computer printout.

We are here to try to change that directive from whatever source it came.

We prevailed upon other State and Federal agencies for their opinion. After actually riding the range with State Range Management Specialist, Dr. Kenneth Sanders, County Agent, Bob Loucks, District Conservationist for Soil Conservation Service, Ralph Swift, and Range Conservationist for the BLM the reports were submitted to the BLM. All of these specialists are in the field of range management. They rated the allotment in good condition and with an upward trend. There was very little evidence of erosion except for some road erosion caused by four wheel drive vehicles. I thank them heartily for this report and their time and efforts.

The range condition is still not accepted by the high ups in the office.

By using the criteria or method of suitability by the agency would put most of the ranchers along the Salmon River and up the Lemhi Valley out of the cattle business.

There isn't any justification for it. Because of a percentage of 50% slopes their theory is that cattle can't or won't use these slopes for grazing.

Because grass is the plant class that produces that least number of animal unit months is then the factor limiting the number of animals that can be grazed on the allotment. Then you reduce this further by subtracting the wildlife use before allotting to cattle. The next reduction is when you calculate amount of grass available by using proper use percentage per plant. For the Spring you use 30% but state that the plant could be used up to 50%.

You don't give any allowance for wildlifes' use of private land. We are glad to see them and don't begrudge their use of the hayfield.

When the departments get the wildlife number back up we will make room for them.

All of your calculations are taken only from suitable areas by your criteria.

The real facts: at this time the cattle and horses use a great amount of Balsam flower and lupine. We have calves that document the use of lupine at this time. The horses and cattle also graze a lot of the area that you category as unsuitable and they have used these steeper slopes for 100 years.

Regardless of the number in the crew or money expended, you can't arrive at a true picture using the criteria and formules that you have in this impact statement.

Your assumption of taking all the cattle off the range that the range would improve 100% is far from fact.

Summary: The money used and time spent on this impact statement would have cured most of the problems in this district with added improvements on the range.

We can only live with and survive with current livestock grazing programs. We would like to add some range improvements such as water developments and short fence if the distribution by the water developments doesn't give the desired results.

Free enterprise has to survive to keep our great country on a sound financial basis.

Your proposals would have a devastating affect on the economy of Lemhi County.

By your statement in Proposal #5 "This alternative would initially cause some permittees to consider selling or consolidation due to income losses. All permittees should be able to meet their cash expenses." Thank you.

DENNIS TRUMBLE:

My name is Dennis Trumble, and I represent the Salmon Valley Chamber of Commerce and I have just a brief statement. Because of the substantial economical support that the Salmon area receives from the livestock and ranch industry; the Salmon Valley Chamber of Commerce would encourage the BLM to do their best to maintain and improve the grazing allotments in the Ellis-Pansimeroi area. We recognize the grazing lands as a valuable resource, and so we are concerned about the effects that could result if an unrealistic and unworkable range plan being imposed upon the cattle industry. We encourage the BLM to pursue a plan that would preserve, and encourage both the small family owned ranches, as well as the larger businesses in our area. Thank you.

REX TOLMAN:

My name is Rex Tolman. I'm in the Cable Creek Allotment. I'm one of the lucky ones that is not getting hurt by any cut in output.

I'd like to give you a brief rundown of what my allotment consist of. In 1960, I bought the first allotment up there, which was 280 some AUM's up there, and in 1968, I bought some more, another allotment, the Carter Allotment. First I bought the Corbett Allotment. In 1968, I bought the Carter. We went in, in '68 to a rest-rotation, in '68. They felt like--well, I might back up a little bit. In '60, they wanted to give us a cut on the range, cause they said they don't there, but we went ahead and Mr. Coffee was ranger here, we took him up and said we'd like to do a little spring development. Up a few of the draws there why he said, well, he said, we couldn't develop it, he said, it would cost us $4,000 to come up here and develop 23 troughs, which would be pretty expensive. So we went and said, if we put the troughs and that in, would you give the troughs? And he said, yes. So we packed the troughs in, the first one we tried to go in with the wagon and it didn't work and we had to pack it in by horse and the team down to the bottom of the hill, and since then, we're packed the troughs in. On our allotment we have put in 19 troughs, we have put in a mile-a mile and three-quarters of pipeline, and a mile of fence, and a team. The BLM has put in two miles of pipeline for us and 8 troughs. We have put in approximately 6 miles of fence.

When we went in in '62 the Forest Service said there was trespass there, the BLM said there was trespass, we packed in three miles of wooden posts on a packstring, spent 6 weeks up there, fenced trespass back and forth from the Forest to the BLM.

In '72 the study shows--your study shows when I went on to a rest-rotation they took a survey of my range; they said there was 16,192 acres of range with 355 acres of unsuitable, which is 2% unuseable. In your study today, it shows that there is 16,192 acres of range, 5,977 acres unuseable, which is 30% of the range is unuseable according to your studies today. I think that most of the fellows here will admit to your studies

The forage allocation chart in Table B-5 is interesting. In Fall and Winter grazing you will allow only 50% use of grasses. If you will check your Hydrology charts I think you'll find most of your grasses are dormant during this time period (Sept. 1 - Feb. 28). Because these plants are dormant you cannot hurt them through grazing. Their life cycle for the year is finished. If you are concerned about litter production, that is why grazing systems were invented. You rotate the use to help plant vigor and maintain ground litter. Your use factors for Spring and Summer range are very conservative. Why did you choose these low factors? I believe you can meet your 20 year objectives with a 50% use factor, especially if an intensive grazing system is installed and followed. H-5

Your economic portion was very confusing to me. Just exactly what are you trying to show? You make statements on total income in Custer and Lemhi Counties. You show the worth of BLM grazing to the local community, however, I feel you have failed to show the true short-term economic impact of the alternatives to the ranchers scheduled for a cut. H-6

Another confusing term when discussing proposed stocking rates is "5-Year Average License Use". Is this smoothing over the impacts of your proposed cuts? Regardless of whether a license is in non-use or not it still has a base value of $25 to $55 to the rancher and banker. This is backed up by what you say on page 3-22. When a person is licensed for certain months he is licensed for that use. When you are proposing a cut, the cut is made from that licensed use. H-7

Your impact statement states on page II "As can be seen from the above discussion, the long-term effects of many of the alternatives are not widely dissimilar (with the exception of Alternative 3). This is a reflection of the low magnitude of problems in the EIS area..." If this is true and if all the long-term effects are similar, why force a few ranchers to take economic hardships through your proposed action. H-8

I have a sixth alternative--why don't we (BLM, ranchers and other agencies) develop well thought out coordinate management plans. Why don't we develop these ranges and then look at specific stocking allocations. By following this alternative, working and dealing together we can talk to each other and the Fish and Game and get further than generalities which do not mean much. I am sure this is the alternative many ranchers were alluding to during our public meeting last Sept. 30 in Hay, Idaho.

And finally, I think that if many improvements had been installed in the past the range would be in better condition and many livestock cuts would not have to be made now.

JIMMIE DOWTON:

I'm Jimmie Dowton from May, Idaho. I'm representing the Lawson Creek Cattle Association, which I'm a member of and the Association which is located in the Ellis-Pahsimeroi Draft Grazing Environmental Impact Grazing Study area and I would like to request that my full statements be recorded in this hearing.

today. I think that my range is a good piece of range. Alot of people would like to have it. But what I am wondering, it says that you would give it back to these fellows that I've been working their range, if they will cooperate with you, and do these things, but will they get any increase in 10 years from now, that's what I am wondering. Thank you.

ROY ELLIS:

My name is Roy Ellis. I'm from Ellis, Idaho. I run on Allison Creek Allotment.

The following is a list of concerns I have with the Ellis-Pahsimeroi Draft EIS.

H-1 There are some confusing statements in the EIS I would like to point out. According to your "no-change" alternative no AUM's have been allocated to wildlife use. With no allocation where does the total 5,070 head of big game animals present on the range today harvest it's forage? Whether or not they eat it on suitable range or unsuitable range they are definitely there and they are consuming something. The way you present the situation on Table 2-5 leads me to believe that the big game animals are starving. The animals are present and their use should be shown in your allocation chart. According to your chart, unless your proposed action is accepted there will be no game.

H-2 In Alternative 1 with an expected 3% increase in forage there is an increase in livestock AUM's and an increase of 31% in big game. Yet in Alternative 2 there is an increase of forage by 14% and an increase in AUM's for livestock but no change for big game population. Alternative 2 should be more explicit because forage production is over 4 times greater than in Alternative 1. This is confusing to me.

H-3 In your proposed action, if your objective is to improve range condition, why are you cutting livestock use and increasing big game numbers? This is a contradiction in management.

H-4 Another point of concern with wildlife is exactly what are the thoughts and views of the rancher adjacent to BLM range where you propose increased numbers? These people have been consulted as their private hayground and stacks provide for a good share of the big game's yearly AUM need.

I do not believe 13 months to inventory at least 378,947 acres is enough time to do an adequate job. We realize you had a short timeframe to work under, however, your level of inventory does not gather sufficient evidence to recommend reliable, well thought out management strategy or range improvements, let alone forage allocation. Your data could not possibly assess all potentially suitable range. The process takes years not 13 months. The same goes with the location of feasible range improvements. These have to be well thought out under a detailed grazing plan. A detailed plan should look into public and private land coordination. Without this coordination right from the start a complete accurate management picture is impossible, nor can improvements and forage allocation be accurately assessed.

We, as the Lawson Creek Cattle Association, oppose the plan of deferred grazing as proposed in the Impact Statement for our allotment for the following reasons:

1. We oppose the fencing proposed because with what water that has been developed in the past, it serves the grazing areas so there is not a heavy concentration of cattle in any one area, at any critical time of the year. The cattle are scattered throughout the area in order to achieve a balance with the water and grasses. If fenced, it would make a heavy concentration of cattle in certain areas because of the source of water.

2. Most of the grazing permits on this allotment runs adjacent to the individual ranches, which makes the gathering of the cattle easier because of different cowoff dates in the spring of the year and summer and fall for the permittees. Each of the grazing permits have different cowoff dates that makes it necessary to leave it as a non-fenced pasture.

Number 3: We also oppose the fencing which is proposed in this study because of the drainage of this range. It isn't suitable for fences because some of the drainage is east and west, and some of the drainage is north and south, which makes the fencing impossible for proper dispersal of the cattle over the range. The permittees on the west side of the allotment would have difficulty dispersing their cattle to the east side of the allotment and vice-versa for the east side permittees because the inaccessibility due to the terrain of the mountains.

4. We disagree with the statement of Appendix C of the Suitability Study that states that slope percent over 50% is unsuitable for grazing. We disagree because cattle will graze out and around to the water. If water is available on the range properly sold, even though there is slope steepness. The present trails and cattle signs on these slopes verify that livestock do utilize the range of 50% or more grain slope.

5. We met with the BLM and the Forest Service earlier, on May 11, 1981, at the old Forest Service Building at May. On these proposals, and we agreed, there was not to be any deferred grazing or fenced pastures. At the meeting we stated that we wanted the allotment managed as it is now. At that time, the BLM agreed that the range was in more than satisfactory condition and the Impact Statement, Table 2-4, Chapter II shows that there is more available AUM's than what is currently being used on the allotment because of the good range condition.

6. We are in agreement with the statement that further development of ponds and pipeline as stated in Chapter 2, Table 2-7, of the Impact Statement for the grazing of livestock and also wild game and game birds.

We would like to invite the study group and the BLM officials to meet with us and go on horseback with us to the area so that we can show why we do oppose some of these portions of the draft Impact Statement. Thank you.

DON GRAYOT:

I'm Don Grayot, and I'm speaking as a private citizen.

I have several issues to address, which will be comparatively brief, and maybe a little bit long-winded. I'm going to go along with Ray Ellis that the BLM should enlist the services and the help of the various ranchers in the areas affected. I suggested that same procedure to the Forest Service about four years ago at a meeting very similar to this, in this same room. They decided to go along with it and Dick Hauff has told me he found it very helpful in developing the EIS's at that time. Now they've quit that, but he did say it was a great deal of help because most of you guys that are in here now have ridden these ranges for anywhere from 15 to 50 years; you know the condition of the range then; you know the condition of the range now. With all due respect to the study group, you are comparatively new to the area. It's a big area. It's hard to get over that entire area even once a year, let alone two, or three, or four times a year to see the actual growth out there.

I'm also going to go along with Mr. Dowton that this 50% concept (I almost call it a rule or regulation), I'm sure that it's not a rule or regulation, but it's a concept. Now in the world are you going to teach a cow to stay off the 28%--or28° slope? The only way in the world that you could do it would be to run zig-zag fences around, and they'd have to be pretty stout fences, because if there's green grass on that side, and there's good grass on this side, that cow is going to go to the other side; and I don't care what kind of a fence you put up. Either he or she will make it through there one way or another. So, it is not a good concept.

Now it has been stated that where you have these kind of slopes, livestock tend to eat out the lower areas first and then go up the hill. But if you have riders out there, and the biggest share of these cattlemen now have riders, they do go up the slopes. I'm talking about what is going to happen eventually when they get down to doing the EIS on this area here, on up the Lemhi, 50% or more of the grazing that's good grazing, would be cut out.

I've run cows for 15 years, not very many, but I've ran cows, and I rode the range. I know the condition of the range, I've been in grass on Williams Creek, on the south side of Williams Creek, that was above my knees. If we could get another water trough up on the top of that hill, we could graze the whole confounded hill. It didn't hurt the hill a bit when we did get them up there. There was a little bit of moisture and there was a few pot holes where they could get water. It didn't hurt the range. They didn't even make a dent in the grass.

Now, there's plenty of places in here, if we could get this confounded court off our back in Washington D.C. and let the BLM cooperate with the ranchers, then we could get some range improvements that would really amount to something.

Lemhi County is 92.4% federally owned. If they go ahead and cut these allotments, that means that some cattlemen are going to have to try to

bring their cattle back down into this 7.6% of land that is privately owned, we are using all of the pasture that is available at the present time. Where in the world, I pretty near used another word, but that one will do, where in the world are you going to put these extra cows? You are going to have to sell them or that is going to have an adverse socio-economic impact upon this community, and we're in bad enough shape the way it is. I will have the written comments in to you previous to March 22. Thank you.

KEN WHITE:

I'm Ken White. I live up in Pahsimerol. I utilize the Mahogany Creek Allotment, I would like to suggest that different ways were needed to determine how many cows we should have on the range. I have a different operation than most everyone. I don't turn out a cow and a calf. If I have a Holstein dairy heifers and I buy the calves when they are a day old or about there I turn them out and I can find them in the summer, and then I turn them--on the 10th of May is when my allotment opens, so I have an allotment for about 50 head. So when I turn them out, I keep them about three years, then I sell them as springer heifers. So in the spring I will turn out, if I turn out fifty head, a third of them will be weighing in the range from about 300 to 400 pounds, and they are counted as one; so I have a third, I'm turning out at 350 to 400 pounds. I have probably a third I'm turning out that are a little less than two years old and the other third would be a year older than that. But I am confronted with a cut of 10 head, so you can look at the range and my judgment is, I've been at Pahsimerol since about 1936, and I have to say that the range in Pahsimerol is 100% better, all the way around, than it was when I first came here. I feel that this has been mentioned before, but there needs to be a better recognition of the livestock user. There needs to be a better communication with them, and all the livestock people I know would be glad to improve the range. When I went there, I wanted to dig up some sagebrush and plant some grass, and I was told I couldn't do it, and that was 10 years ago. I voluntarily--my permit originally was from the 10th of May to the 31st of October. I voluntarily cut back half, and now I was informed that they are going to cut me 10 more, and the reason they gave me was because I didn't have enough acres. I don't hear any complaint about the condition of the range. So, I'm suggesting that they need to have a little different method of determining. Instead of going just by numbers, if I turn out 50, the consensus is that I turned out a cow and a calf. If the cow weighed 1200 and the calf weighs anywhere from 150 and 200, but I didn't do that. I think there was a big discrepancy there that needs to be looked into.

BILL SAGER:

I'm Bill Sager from Salmon.

I represent the Idaho Cattlemen's Association. I'm a member of the legislative committee. Idaho cattlemen would like to object to this suitability criteria. It should be obvious to anyone that the range is not unsuitable just because of a 50% slope. Forty-five degrees is equal to 100%. The ICA is willing to manage the range on conditions and trends, that the vegetation and soil is there. We will have a written comment.

MIKE OVERACKER:

I'm Mike Overacker and I'm the Secretary-Treasurer of the Lemhi County Cattle and Horsegrower's Association.

Similar to the Idaho Cattlemen's Association, the Lemhi County Cattle and Horsegrower's Association feels that we must object strenuously to the Appendix C, which pertains to the suitability of grazing. And there's parts of it we have to agree with, such as, we feel that if livestock can graze it without damage, just as you state in your report, then there should be no problem there. And if by the same token, this 50% slope just bothers the heck out of me. It is totally unreasonable; the cow doesn't know about this 50% and they are utilizing the ground and the reason they are utilizing it is because it is suitable. Just to say that it's not and to cut a man's allotment because he has alot of steep ground on it, is not realistic. I think alot of you people don't realize that the beef cow is unique in that she harvests roughage that grows on steep hilly land and she harvests this ground that you can't do any other agricultural things with. You can't get equipment on it to grow crops. What you're grousing is to take away this unique ability of the beef cow. So, we are again very much opposed to the suitability concept. We feel that the reasonable way to manage it is to go and look at the condition of it and to look at the trend, and if the conditon is good and the trend is static or improving, then there should be no cuts or if it's increasing - improving then there should be some additional grazing allowed; and if there's problems and is erosion then, or if the plants are reducing in numbers or you've got just old plants - no young plants, then some reduction is in order. But I think that you guys sometimes forget there's two ways you can go. If it's improving, let's give the guy a little bit more grazing instead of taking it all away. Sometimes you only know how to take it away. There will be a written comment sent in. Thank you.

Response to Public Hearing Comments

Regarding Roy Ellis Comments

H-1 The allocation process is an attempt to balance forage consumption levels with the amount of forage available after plant requirements have been met. In effect, it is an accounting process in which each of the various consumer groups is credited for the use it makes. This must be done in order to avoid over-utilization of annual plant production. This has not yet been done for wildlife use.

Lack of an allocation for wildlife does not necessarily mean that they are starving. It does mean however, that there would be no way of determining if sufficient forage for existing or projected wildlife populations would be available.

H-2 The BLM is attempting to produce in 20 years 35,016 AUMs for livestock use. This is a 31% increase over the current AUM situation for livestock. Wildlife numbers are expected to respond gradually over this 20 years by a 17% increase.

To increase the number of AUMs for livestock, the range has to produce so many additional pounds of forage above what it is now producing. Wildlife numbers are expected to increase naturally as a result of additional vegetation becoming available. This is an indirect response in wildlife numbers from increases in vegetation. The direct control of wildlife numbers is carried out by the State Fish and Game Department through their changes in seasons, limits, etc.

The BLM is managing on a multiple-use concept which means that additional forage as it becomes available is allocated among uses such as livestock and wildlife (CFR 43 4110.2-2(a)).

H-3 In both Alternative 1 and Alternative 2, wildlife has no initial allocation and livestock numbers receive no reductions. The Salmon District wildlife biologist feels that since this situation is similar to both Alternative 1 and Alternative 2, the increase in production estimated for Alternative 2 will not result in an appreciable increase in wildlife numbers above those given for Alternative 1. It is also felt that theoretically, wildlife will be allocated AUMs. However, the increased number of cattle that will be allowed due to an increase in vegetation over 20 years, will not allow a difference to be realized between the 3% increase in vegetation production and the 14% increase in vegetation production.

H-4 There is no question a number of wildlife species make considerable use of private lands. With regard to big game, use is dictated to a degree by the type of fencing encountered upon entering private land (eg. woven-wire will keep all but the most determined antelope out). The BLM is not in a position to prevent big game animals from entering private lands or to make forage allowances on private lands.

Response to Public Hearing Comments

Roy Ellis (Cont.)

H-5 The use factors used were those obtained from extensive research. These factors are a measure of the herbage removal that each species can tolerate and still maintain itself in a viable, healthy condition.

If intensive grazing systems were implemented, the allotments would be divided into pastures. Not all the allotment would be used each year. If a person were calculating AUMs for that allotment in any one year they could only use the acres and vegetation in whatever pasture was used that year. In other words, if an allotment were scheduled to be divided into two pastures, you could really use only half the vegetation and acres for computing AUMs for that allotment.

References used for use factors were the following:

Forage Allocation Method. April 18, 1979, Idaho State Office of the BLM, Instruction Memo No. ID-79-212.

Limiting Factors Approach to Vegetation Allocation by Jens Jensen, Chief-Branch-Biological Resources, Utah State BLM Office, Salt Lake City, Utah.

H-6 Pages 4-18 to 4-23, 4-28, 4-31 to 4-33, 4-37 to 4-38, 4-42 to 4-43 and 4-46 to 4-47 show how the various alternatives would impact ranchers in the various budget groups. The number of reductions and their severity are also identified. More detailed identification of impact is not possible due to Federal regulations relating to privacy and proprietary information. See response 2-1

H-7 Reductions in this EIS are those calculated by comparing the Active Preference to the Proposed Livestock Use column in Table 2-4. Impacts were discussed on this basis. The column indicating 5-year average license use is in the EIS for comparison purposes to show readers how various allotments have been used over the past 5 years.

H-8 Refer to Overview section 3.

COMMENT LETTERS
AND
RESPONSES

COOPERATIVE EXTENSION SERVICE

Courthouse
P. O. Box A
Salmon, Idaho 83467
Phone (208) 756-2824

University of Idaho
College of Agriculture
In Cooperation with the
U.S. Department of Agriculture

February 18, 1982

Jerry Wilfong
EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Jerry,

I have read and reviewed the draft EIS for the Ellis - Pahsimeroi planning unit. For the most part the document is well-written. It is not clear just what the author is trying to show in the economics section. It seems to me that he makes apples vs. oranges comparisons in comparing total cattle and calves in the region to the number of animal units on ranches impacted by the proposed action. When I studied economics, it was customary to look at the basic economy and the secondary economy. In Custer and Lemhi Counties the basic economy has five sectors - farming and ranching, mining, manufacturing (lumber, beans, cheese), tourist services, and Federal civilian employment. Although the contribution from each of these sectors varies, ranching in most years accounts for 40-60% of the basic economy in Lemhi County and at least that much in Custer. Your writer, it seems to me, attempts to aggregage all government and imply that "government" is the largest industry in the county. While local government is large part of the secondary economy (Salmon Public Schools is the largest singls employer in Lemhi County), I believe most economists would not consider it an industry since it would not exist except for the basic industries.

I-1

I-2

I doubt that the economic analysis is too important in this instance since your proposed action would cut only 1494 AUM's out of some 715,900 total AUM's in Custer - Lemhi Counties -- a matter of some 125 animal units out of 59,620. The impact of the proposed action will not be on the regional economy, therefore, but will be primarily on individual ranches, particularly on those 8 facing 24-77% reductions. Unless some action is taken to mitigate this action, they may have severe difficulties maintaining an efficient size. Permittees on Morgan Creek will reap significant benefits, permittees on at least half the allotments will suffer sizeable losses.

The sections on social conditions on page 3-23 and 4-24

using an area and have used the area, and if the soil is stable, then it should be assumed that the range is suitable, regardless of any arbitrary criteria that are established. The allocation scheme itself assumes that wildlife find the "unsuitable" range useless.

The net effect of the whole scheme is error compounded by error. Bias is introduced at each step of the process. For example, if acreage of a range site is miscalculated by 10%, if there is a variation in usable forage production between two ecological condition ratings and the condition is misrated one degree, and if productivity is misjudged by 10%, the multiplying through these very small individual errors productivity is miscalculated 30%. The normal variation from expected production at these precipitation levels alone is about 15%. If we then establish some arbitrary criteria for range suitability that make us subtract 50% of the range as unsuitable, we are down to 35% of the AUM's available for livestock that we started with.

I have spent two days (5-7-81, 5-21-81) on the ground in Iron Creek Allotment. I am familiar with most of the area from Iron Creek to Rattlesnake Creek. The allotment has a documented history of over 1200 AUM's for some 40 years and was undoubtedly more heavily used for the 60 preceding years. BLM data for the "suitable" range (which must be the most abused because it is close to water and flat) shows 11% poor condition, 51% fair condition, 33% good condition, 5% excellent condition. BLM photo trend is up - 1 down. Apparent trend observed on 23 points by BLM is 8 up, 10 static, 5 down. In other words, the BLM says that this range is in good shape and improving.

After collecting productivity data, however, the BLM finds that 485 AUM's are available for permanent livestock grazing. Even if all AUM's from the unsuitable rangs (339) are added in, only 824 AUM's are available. After developing the data, the BLM realized that it was ridiculous, so they applied some fudge factors and determined that 795 AUM's are available. If only 485 AUM's are available and 1200 AUM's have been used for over 40 years, the "suitable" range would look like a corral. The ecological condition would be poor and the trend would be down. In fact, if only 795 AUM's are available the same situation would prevail. It appears to me that the BLM proposes a 34% reduction on this allotment merely to placate the people who developed the procedure. By the arbitrary suitability standards employed, 50% of this allotment is unsuitable.

The same situation prevails in the Camp Creek allotment. A small amount of this allotment is in fair ecological condition. Most of the allotment would be rated good with a small amount in excellent condition. The only trend plot observed in the allotment is up. Licensed use is 201 AUM's. BLM proposes a 42% reduction to 117 AUM's - not because of range condition or trend, but because by the arbitrary suitability standards employed, 57% of the allotment is "unsuitable" for livestock grazing.

ars purs baloney and have no place in this statement. 3-23 boils down to ranchers attitudes may make sense and may not have strong feelings of well-being. On 4-24 we find that ranchers are threatened by multiple use, when, in fact, ranchers and producer groups have been major supporters of the concept. I don't believe that the author can document any livestock operations in this planning unit which are either hobby farms or supplemental enterprises.

Now to more substantive issues. There are serious questions about the methods used to determine proper stocking rate on these allotments. I do not believe that the BLM can document any level of reliability or accuracy for this approach. The forage production and allocation scheme is not supported by the scientific community in general and has been specifically repudiated in at least one instances (see memorandum 4673, 6-29-81, from Nevada State Director regarding Callaway Survey).

To review the procedure used: 1) SCS mapped 15 range sites and rated ecological condition from 821 observations in the unit; 2) BLM then estimated productivity using a double-sampling scheme with 10 plots per transect, plots at 200 step intervals, 2 plots estimated and clipped, 8 plots estimated and all estimates corrected by clipped-estimated regression. Transects assigned so that 3 transects were run in each condition class in each range site; 3) BLM then adjusted their forage production data for precipitation during the year the sample was collected; 4) BLM then assigned proper use factors for grasses, forbs, and shrubs (see Table B-1); 5) BLM then made a range suitability determination and subtracted all forage produced on "unsuitable" range; 6) BLM then allocated forage to estimated wildlife based on forage preference and allowed the remaining biomass to be allocated for domestic livestock.

I object to this whole procedure for the following reasons: 1) The concept of ecological condition employed leads to public misunderstanding that vegetal condition is unsatisfactory for any successional stage below climax (excellent condition). 2) There is no way of assessing the accuracy or repeatability of data obtained using the systematic-judgement sampling procedure employed. 3) Using Sneva's method of estimating the effect of departures from normal precipitation on biomass production, the Salmon area had a yield index of 89% ± 16.4% and the Hay area had a yield index of 74% ± 13.6%. I question whether we can assume that either forage production or forage production are a constant 8% of normal for 90 miles up and down the valley from these stations. 4) Proper use factors may have some place in range management when dealing with continuous grazing systems; however, they have no applicability with deferred rotation or rest-rotation systems (see page 22, Hormay, TT-4 (2200), "Under rest-rotation grazing, no attempt is made to graze the vegetation in any pasture or on the range as a whole to any particular degree." 5) The concept of suitability employed by the BLM is absurd. Suitable range equals usable range and areas of very low inherent productivity or areas where excessive soil movement is occuring. Most of the Ellis-Pahsimeroi unit has been grazed by livestock for over 100 years. If it can be demonstrated that livestock are

This simple fact of the matter is that the method by which you propose to establish stocking rate has no scientific validity. Most authorities agree that in accord with an established stocking history, acceptable condition should be determined by the manager and stocking rate should be adjusted for trend changes.*

Lastly, in view of current economic conditions, it is unlikely that $618 thousand will be appropriated lump sum for range improvements in the Ellis-Pahsimeroi planning unit. BLM admits that only 17% of the unit is in poor condition and only two allotments are in a down trend. In view of these facts and with a projected cost of $90/AUM for improvements ($618 thousand÷6833 AUM), I believe that Alternative 2 is a more viable choice. Costs could be greatly reduced if permittees are allowed to construct some of the most urgently needed improvements.

Thank you for inviting comment.

Sincerely,

Robert B. Louchs
Lemhi County Agent

RBL:lh

* Suggested references on attached page

* Suggested References:

1. Cook, W.W. and L.A. Stoddart. 1953. The quandry of utilization and preference. J. Range Manage. 6:329-331

2. Dyksterhuis, E.J. 1949. Condition and management of range land based on quantitative ecology. J. Range Manage. 2:104-115

3. Ellison, L., A.R. Croft, and R.W. Bailey. 1951. Indicators of condition and trend on high range-watersheds of the Intermountain Region. U.S. Dep. Agr. Handbook No. 19 66p.

4. Hormay, A.L. 1970. Principles of Rest-rotation Grazing and Multiple Use Land Mgmt. USDA For. Serv. Training Text 4 (2200) 26p.

5. Humphrey, R.R. 1947. Range forage evaluation by the range condition method. J. Forest. 45:10-16

6. Jameson, D.A., R.F Gierisch, S.Wallace, and R. Robinson. 1970. Range condition evaluation by discriminant analysis. Colo. State Univ., Range Sci. Dep. Sci. Ser. 8 26p

7. Parker, K.W. 1954. Application of ecology in the determination of range condition and trend. J. Range Manage. 7:14-23.

8. Pechanec. J.F. and G. Stewart. 1949. Grazing spring-fall sheep ranges of southern Idaho. U.S. Dep. Agr. Circ. No. 808. 34p.

9. Stoddart, L.A. 1935. Range capacity determination. Ecology 16:531-533.

COOPERATIVE EXTENSION SERVICE

University of Idaho
College of Agriculture
In Cooperation with the U.S. Department of Agriculture
SW Idaho R/E Center
Rt. 8, Box 8378
Caldwell, ID 83605
March 1, 1982

Jerry Wilfong
EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Jerry:

I have reviewed the Ellis-Fahsimeni Draft Environmental Impact Statement and would like to offer the following comments for your consideration.

First, I have reviewed several BLM EIS's and have found one flaw in all of them. This issue relates to what is known in economist jargon as "distributive equity." The problem is that BLM has ignored this in all of the EIS's. For example, in your draft EIS (page 4-18), mention is made of the impact of the proposed action on rancher income. According to your calculations, "17 permittees would receive AUM decreases, 19 permittees receive increases and 9 with no change." In terms of the 17 facing reductions, "the average reduction is 16% and $1 AUM's" and "reductions vary from 1 and 50%." Obviously some ranchers are gaining and some are losing. However, the statement on page 4-24 ignores this fact. By using gross terms such as "rancher income would increase $1000 in the short-term and by 157,000 in the long term", you are ignoring the fact that the rancher that is facing the 50% reduction may experience some real economic hardship.

2-1

The important point is not how much total rancher income increases (or decreases) because of the proposed action and alternatives but who gains and who loses and by how much? For example, the one permittee losing 407 AUM's (p. 4-18) may be looking at substantial income reductions. Assuming a cow eats 650 pounds of dry forage per month, this rancher would have to purchase about 132 tons of hay to replace the lost AUM's. If hay costs $60 per ton, this would add about $8000 to his production costs. His other alternatives would be leasing private pasture (if available) or reducing herd size.

Second, the economic multipliers calculated by DYRAM and reported in Appendix E (p. D-2) are rather surprising. I would guess that the livestock income multiplier would be closer to the one reported for Blaine County. I am familiar with the trade area cited and feel that the lack of a major trade center within close proximity to Lemhi and Custer counties would result in more local spending, and thus less leakage from the regional economy. Possibly the conversion from national input-output coefficients to regional coefficients through the use of employment data may have shortcomings as far as resource-based economies are concerned.

Response to Letter No. 1

1-1 Change 2nd paragraph, pg. 3-20 Economics to read:

The livestock industry would be the most impacted by the various alternatives. According to the 1980 Idaho Agricultural Statistics, there were 23,500 stock sheep and lambs and 91,000 cattle and calves in the region as of January 1, 1980.

1-2 No attempt was made at this point to differentiate between basic and nonbasic industries, just identification of total economic activity.

Jerry Wilfong, BLM - Salmon
March 1, 1982
Page #2

The proposed action calls for approximately $616,000 in expenditures for range improvements. What are the benefits associated with these expenditures? If those listed in tables 4-3 and 4-6 (pages 4-19 through 4-22) are the major benefits, I would urge you and your staff to begin searching for other benefits. If other benefits are not quantified (in dollars and cents), I feel it would be very difficult to justify the expenditure using the required benefit-cost analysis.

2-2

Thank you for the opportunity to comment.

Sincerely,

Neil R. Bixby
Ext. Range Economist

NRB/rb

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Response to Letter No. 2

2-1 The fact that ranchers facing SDS reductions may experience some real economic hardship is not being ignored by the Bureau. However, various rules and regulations relating to confidentiality and questionnaire limitations prevent further disclosure than is provided here in the text.

2-2 Table 2-9 gives a breakdown of the benefits and impacts associated with the Proposed Action and the 5 Alternatives. There are other benefits than those associated with the economic benefits presented in Tables 4-5 and 4-6. Monetary values were not attached to such benefits. It is extremely difficult to attach a monetary value, for example, to a 10-20% improvement in lower bank cutting. We have found that the best practice is to acknowledge that these benefits exist and are important but we do not attempt to put a value on them. However, such benefits are real and reflect true values. We can merely state the projected increases of the Proposed Action and the various Alternatives.

Each project will have a cost-benefit analysis performed during the development of the Allotment Management Plan. The decision maker has the responsibility to decide what values can be derived in a comparative fashion from the various choices and to weigh these against the expenditures. The final selection on project depends on a whole range of considerations which must of necessity rest on subjective judgement.

STATE OF IDAHO
DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

March 3, 1982

Mr. Jerry Wilfong, EIS Team Leader
Bureau of Land Management
Box 430
Salmon, ID 83467

Dear Mr. Wilfong:

The Idaho Department of Health and Welfare, Division of Environment, has reviewed the Ellis-Pansmerol Draft Grazing EIS and wishes to submit the following comments.

Water quality is not expected to be impacted by the proposed actions. Further, soil resource improvements are anticipated relative to channel stability (page 4-2) and riparian zones (page 4-16). We are, therefore, in support of the proposed action and alternatives.

Thank you for the opportunity to comment on this draft statement.

Sincerely,

Lee H. Stokes, Ph.D.
Administrator

LWS/kks

EQUAL OPPORTUNITY EMPLOYER

Lawson creek allotment

Salmon Idaho
March 5, 1982

Bureau of Land Management
Salmon Idaho.

Dear Sir

I am appose to any fence on the Lawson Cr. allotment Alternative 1 or 2.

I am also appose to deferred grazing. You cannot put alot of cattle in one pasture they must be well scatter on this allotment

Shotgun Cr and Hoge Cr are to rough and will cause a good deal of damage to creek bottoms, with to many cattle in a 2 pasture deferled rotation.

About 10 years ago we put a divider fence between Hoge Cr and Lawson Cr which helped our allotment a good deal.

Also when Hoge Cr was trumpeg from sheep to cattle it also help.

Lawson creek allotment

Part 2.

More water development and dogtooth Burning would help. This allotment is use primarily for one month in the spring, May 1 to May 31, With a good rain in June which is a good rain month this range makes a good recovery and has very little use summer & fall

Yours Truly
Lloyd Carter Sr.

Rt 5 #2, Salmon Idaho

COOPERATIVE EXTENSION SERVICE

University of Idaho
College of Agriculture
In Cooperation with the
U.S. Department of Agriculture

1330 Filer Avenue East
Twin Falls, ID 83301
March 9, 1982

Mr. Jerry Wilfong
EIS Team Leader
Bureau of Land Management
P. O. Box 430
Salmon, ID 83467

Dear Jerry:

I have reviewed the Ellis-Pahsimeroi draft EIS and would like to submit some brief comments, particularly regarding the Iron Creek and Camp Creek Allotments.

Aside from the fact that I have some problems with determining carrying capacity with the BLM's forage allocation model, the range suitability classification, and forage allocation to wildlife by allotment, the EIS appears to be well done. I especially applaud the acknowledgment in the summary that ranching groups were the only segment of the public that contributed to any degree in the public consultation phases of the planning process. It would have been helpful if a table showing suitability classification in acres by individual allotment had been included, as well as the suitability map.

Conceptually the forage allocation model is okay, but it is only as accurate as the individual pieces of information that go into it. With a rather rough estimate (what is the confidence interval of your data) of forage production, an estimate of a proper use factor that does not take into account the type of grazing system being used, a suitability formula that does not consider local conditions or input, and allocation of forage by allotment to highly mobile and seasonal wildlife herds, the output is a very gross estimate of carrying capacity. Such data should not be used as the sole criteria for adjusting stocking rates. It may be helpful in analyzing the possible cause of a resource problem, where such a problem exists, but I do not feel it is accurate enough to be used in making major decisions that may have an adverse impact on one or more people's livelihood. In Table 2-4 (page 2-4), adjustments of as little as 1% are made between proposed livestock use and the 5-year average licensed use. This pretends an accuracy that I doubt anyone feels exists in the data. I question that even a 10% adjustment should be indicated. 5-1

On May 7-8, 1981, I had the pleasure of touring the Iron Creek and Camp Creek Allotments with the permittees, Dave McGowan of your office, Bob Loucks, and Ralph Swift of the SCS. Based on what I saw that day, I really question that a reduction on the Iron Creek and Camp Creek Allotments of 34% and 42%, respectively, from the 5-year average licensed use is necessary. Although it is unclear from the EIS why these two allotments are scheduled for such large reductions, I assume from the suitability map that most of the cuts are due to a large percent of the area being over 60% slope and/or excessive distances from water. Both allotments appeared to be in relatively good condition when I toured them and the ecological condition map in the EIS also indicates this. Obviously, if the 5-year average use stocking rate is excessive or there are major distribution problems because of suitability, there should be some real problem areas. However, I did not see such problem areas on my tour and the ecological condition map does not indicate such areas. I would appeal to you to use the past use record and condition and trend information to determine the carrying capacity of these two allotments, rather than the forage allocation model. There may be other allotments that also should be looked at in this manner.

Thank you for the opportunity to comment on the Ellis-Pahsimeroi EIS.

Sincerely,

Kenneth O. Sanders
Range Management Specialist

KOS/gm

The University of Idaho is an equal opportunity/affirmative action employer and educational institution.

Response to Letter No. 5

5-1 Adjustments were based on active preference or the number of AUMs a permittee was allowed to use. The five year average licensed use was based on the actual AUMs that a permittee indicated he was going to use at the beginning of each grazing period. This is total preference minus non-use and as shown in Table 2-4 not scheduled use is also subtracted in two cases. The adjustments must be weighed against the active preference which totals 27,079 AUMs. The smallest adjustments made from active preference to proposed use is a 12% decrease. During the NEP II procedures if an allotment appeared to be within 10% of the active licensed use, a reduction was not proposed.

March 4, 1982
Ellis, Idaho

Mr. Wilfong.

We would like to protest the use of a rotation system in the Lawson Creek Allotment for the following reasons;

1. It would create a hardship and expense on users because of the distance involved in moving from one end of the pasture system to the other on a rotational basis.
2. I feel that we have done a more than adequate job of managing our own program, with better water distribution we can work out a good program with less expense involved.

We appreciate working with you on some other program, but we do not feel that a rotation system for this Allotment is the answer to any problems.

Joe Hughes and Son

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

MAR 9 1982

Jerry Wilfong
EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

Ellis - Pahsimerol Draft Grazing EIS

The Region 10 office of the Environmental Protection Agency has reviewed the subject Draft EIS. The watershed protection provisions included in the preferred alternative should effectively minimize the water quality impacts of the proposed grazing program. We have rated this Draft EIS LO-1 (LO = lack of objections to the proposal; 1 = sufficient information in the EIS).

Sincerely,

John R. Spencer
Regional Administrator

cc: Lynn McKee

Challis, Idaho
March 15, 1982

Jerry Wilfong, EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong,

I am writing this letter to protest the proposed changes in the Lawson Creek grazing allotment unit as I can foresee nothing but management problems associated with it. In the first place the unit does not lend itself to the plan as it is proposed. The water is concentrated in certain areas along Lawson Creek, Shoe Creek, parts of Cherry Gulch, etc. All these extra cows bunched up are going to hurt rather than help us. Having the cows spread out like they are now keeps from putting too much pressure on any area.

Also, the plan is going to put an extra burden on us. Having the cows around as called for is going to make for a lot more labor and days spent moving cows. To start with, it will take an extra day when we have to graze them on Pahsimerol first, then probably two days to move them from one pasture to another. All of this on top of the normal riding you do like taking them back to the hills when they come back to the class and hang along the fence.

Another problem you are going to create is with Verl Jones. We'll have a hard time cutting his cows from ours. You got Verl over on Lawson creek and he's going to have a hard time rounding all his cows up. More likely several of his cows will summer on our Forest range.

One more thing I'd like to point out is that every time you move a big bunch of cows with small calves through fences, there is a chance you will leave one or more that has been hid off in the brush somewhere and then them off and lose them.

Something else I'd like to take exception to is the supposed unsuitability of anything over 50% grade. On some rocky, steep ground I agree cows won't graze, but you often see them grazing steep country they can grade around to or that isn't too far from water. It should at least be counted in on the allowable for wildlife as often times they prefer this steeper country as the feed is usually good and there is more protection from predators.

I guess the point I'd like to make is that we were doing alright with the schedule and management plan we had. Your figures themselves admit that the unit is not going downhill and that the grass is good. We do not believe that an appreciable amount of benefit to the range will come from this new plan and that the main result would be a lot of extra work and expense for us.

Sincerely yours,

Ralph W. Hutchison

Lemhi
Soil and Water Conservation District

CONSERVATION DISTRICTS OF AMERICA

P.O. Box 980 · Salmon, Idaho 83467 · Phone: 756-2425

March 23, 1982

SUBJECT: Ellis-Pahsimerol Draft Grazing Environmental Impact Statement

TO: Jerry Wilfong, EIS Team Leader
Bureau of Land Management
P. O. Box 430
Salmon, Idaho 83467

The following comments are submitted by the Lemhi Soil and Water Conservation District to be part of the public record included in the Draft Grazing Environmental Impact Statement for the Ellis-Pahsimerol Planning Unit.

1. No object to the allocation of forage in the EIS. This EIS should, since it deals with generalities, assess the impact of grazing at different levels; a) no grazing, b) low levels, c) medium levels, and d) high levels, for the planning unit as a whole.

9-1 2. We, as a Board, do not feel there is sufficient data gathered on each allotment to make that which is gathered statistically reliable. What is the statistical reliability of the data?

9-2 3. We feel the allocation scheme is biased toward wildlife. Why are there no allocations of forage to wildlife in alternatives No. 1 and 2? Obviously there would be wildlife present in Units under these two alternatives.

9-3 4. We also feel there has not been enough study as to where, when and to what degree wildlife are using the Unit, to make specific allocations of heretofore livestock forage to wildlife. We can't find one statement in the EIS that says because of the current use by livestock in the Unit, "X" species of wildlife are limited. The broad statement that decreasing livestock AUM's will increase wildlife numbers is far too general.

9-4 5. Why, in all alternatives, is Burnt Creek fenced? Is this a standard policy of all EIS's, to fence one stream? Why were no other alternatives for improvement of this stream identified?

6. On page 4-2, it states "there are no allotments where watersheds conditions are presently deteriorating. This is believed to be due to the continuing recovery of the watersheds after cessation of high intensity grazing around the turn of the century." Are there needs for further reductions?

9-5 7. Page 3-8 states that 70% of the range is in fair and good condition and 74% of trend sites were upward. Why then, is there a need for reduction?

(continued)

9-6 8. We go along with the definition that suitable ranges are areas which can be grazed by livestock without damage to the soil and vegetation resources. This should apply to all slope classes. The suitability of a range should be determined by a professional range manager, ranchers included, and not by some cock-a-maxie text book formula.

9-7 9. Your objective to increase livestock forage to 35,016 AUM's in 20 years is commendable, yet none of our Board can ever recall getting an increase in AUM's. It has always been a decrease. How can we be assured the rancher will receive these increases?

9-8 10. Why, in an era of economic severity, does the Bureau want to decrease its income from grazing by 4.6%

11. We believe evidence exists, citing the Morgan Creek and Haynes Creek grazing plans, that problem areas can be dealt with in a coordinated ranch management approach without the unnecessary economic hardship you propose for 17 of the permittees.

12. We feel voluntary suspended use should be used to implement range improvements but not as a sole method for improving range. The following, we believe, is the better alternative;

1) Grazing Management Plans should be developed and implemented for each allotment. At the time of the plan the range should be assessed and the number of AUM's to be used by cattle determined then. This would be done with the rancher and the area manager in the field. If no agreement can be reached then an arbitration process would determine the number.

9-9

2) Agreements should be reached on range improvements, how they will be installed and by whom and who will maintain the improvements.

3) Monitoring of each allotment would be a priority in the plan, with both the Bureau and the rancher with responsibilities.

4) Wildlife, and the other resources, would be considered in the plan. Stream protection would be a vital consideration in the plan also.

13. As a Board we want to go on record in support of the statements made during the public hearing by the ranchers, County Agent, Lemhi Cattle and Horsegrowers Association and the Idaho Cattlemen's Association. All of them stated their case well. They stated their case not out of spite for the BLM or based on petty issues, but based on fact and experience. These statements were well thought out and should not be taken lightly or brushed aside as coming from a bunch of cowboys who didn't know what they were talking about.

(continued)

14. Finally, we feel the statement that individual permittees will implement their own system, is correct. But give them a little credit. If a rancher or ranches are given the responsibility to implement their own system, they will. We also feel they are plenty capable of making decisions that will benefit the range, not only for themselves but for wildlife and other uses. This can only come about if the Bureau and the public cooperate and really let them participate in the decision making process.

To summarize:

The allotment of specific forage in specific allotments should be stricken from the EIS. This allocation should be done in the field with the rancher and area manager in a ranch management plan for the allotment. We feel that through the public participation process there needs to be more communication between the Bureau and the permittee. These individuals have experience on their range that far exceeds that of most people and should be used to the betterment of the range resources.

James Whittaker, Chairman
Lemhi Soil & Water Conservation District
Board Member Board Member Board Member
JW:ID

Response to Letter No. 9

9-1 The confidence level used was 80% which means that 80% of the time the population or true mean will fall within the specified range (will provide the precision required).

9-2 Whether or not the allocation is biased toward wildlife depends on your perspective - 90.4% of all AUMs on ranges used by livestock were allocated to livestock (See M-1).

9-3 Seven M.S. studies on the area were used to help answer the question of "where" "when" and "to what degree". There were three studies on deer, three on antelope and one on bighorn sheep. This information was augmented with additional information collected by the Idaho Department of Fish and Game, U.S. Forest Service, our office and from interviews with a number of local residents.

Table 2-9 reflects the probable influence of various livestock options (Alternatives) on big game. These are in effect limitation levels on big game. Decreasing livestock AUMs does not automatically result in increased wildlife numbers.

There are many variables influencing population levels and livestock use may or may not be significant. As noted in Table 2-9, if all livestock were removed you could probably only expect to have about 200 more elk. There would be an abundance of forage for elk but elk could not take full advantage of it due to lack of thermal and hiding cover. Although the percent increases in big game under Alternative 3 are high, the numbers of animals involved are relatively small.

9-4 Fencing a small portion of Burnt Creek is a recommendation from the MFP II. Burnt Creek is considered to have very high recreation/fishery potential but is presently rated fair/poor condition (Table 3-7). It is felt that its importance as compared to other streams in the area along with its potential for improvement warrants certain protection no matter which alternative is implemented. Due to dewatering, most other streams in the area simply don't have sufficient potential for improvement to warrant project work and related expenses.

9-5 Range management is handled on an allotment basis and reductions and/or increases are by allotment. In comparison to the total EIS area figure, some allotments have a higher percentage of their area in downward trend and/or poor condition. For example, although the total EIS area has only 10% of its range in poor condition, one particular allotment may have 40% of its area in poor condition. The same type of situation can be the case with trend. Although these acreages may not amount to a substantial percentage of the entire EIS area, it does indicate a significant amount in terms of any one particular allotment.

Another factor to consider is that a portion of the 70% fair and good condition figure is in downward trend and a portion of the 74% upward trend is in poor condition.

Response to Letter No. 9 (Cont.)

Production figures were also taken into account in determining stocking rates for the Proposed Action and some of the Alternatives. According to the vegetation inventory, some allotments are not producing enough forage to meet the established preference. These allotments may not show up in the condition and trend problem categories because the permittee's actual use is lower than the licensed use. This results in a situation where the actual number of cattle and time on the range (i.e. AUMs actually being used) are less than the active preference. The range may be in fair condition and/or upward trend under the actual use number. However, if active preference numbers had been using the range, then the condition could have been poor and/or in downward trend.

9-6 Refer to Overview Section 2

9-7 This number, 35,016 AUMs, was estimated to be available if vegetation responses occur as predicted. The monitoring program results will indicate if increases will be given at any particular time. Section 4110.3-1 and 4110.3-2 of the Code of Federal Regulations has provisions for dealing with increases or decreases in grazing use. These provisions provide the basis under which increases are given when forage is available for livestock.

9-8 The issue is responsible management of natural resources: to provide equitably for all resources on a sustained yield basis. BLM must comply with the National Environmental Policy Act and the Federal Land Policy and Management Act by bringing licensed use into line with the carrying capacity of the range and at the same time providing balanced multiple-use management.

9-9 Refer to Overview Section 3

John V. Evans, *Governor*
Daniel T. Enbody, *Administrator*

State Capitol Building
Boise, Idaho 83720

DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS

March 22, 1982

Jerry Wilfong
Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

The Idaho State Clearinghouse has completed its review on the DRAFT GRAZING ENVIRONMENTAL IMPACT STATEMENT ELLIE-PANSIMEROI, SAI #00226575. The following agencies were contacted for their review and comment:

Department of Lands
Department of Parks and Recreation
Department of Fish and Game
Department of Water Resources
Idaho Historical Society
Clearwater Economic Development Association

At the time of sign-off, comments have not been received from the reviewing agencies. All comments received relative to this project will be forwarded to your agency.

If you have any questions, please do not hesitate to contact myself or Lois Wade at 334-4718.

Sincerely,

Gloria Mabbutt, Coordinator
Idaho State Clearinghouse

GM:lw

IDAHO
A Land For All Seasons

March 20, 1982

To The Bureau of Land Management;

As a member of the Lawson Creek Cattle Association which is located in the Ellis-Pahsimeroi Draft Grazing Environmental Impact Statement area I would like to go on record with the following statements ;

We, the Lawson Creek Cattle Association oppose the plan of Deferred Grazing as proposed in the impact statement for our allotment for the following reasons;
1. We oppose the fencing proposed because with what water that has been developed in the past it services the grazing areas so that there is not a heavy concentration of cattle in any one area at any critical time of the year. The cattle are scattered throughout the area in order to achieve a balance with the water and grasses. If fenced it would make a heavy concentration of cattle in certain areas because of the sources of water.
2. Most of the grazing permits on this allotment run adjacent to the individual ranches which makes the gathering of the cattle easier because of the different come off dates in the spring, summer and fall of the year for the permits. Each of the grazing permits have different come off dates which makes it necessary to leave it as a non fenced pastures.
3. We also oppose the fencing which is proposed in this study because the drainage of this range isn't suitable for fencing because some of the drainage runs east and west, and other drainages run north and south which makes the fencing impractable for the proper dispersal of the cattle over the range. The permitees on the west side of the allotment would have difficulties dispersing their cattle to the east side of the allotment and vice versa for the east side permitees because of the inaccessability due to the termin of the mountains.
4. We disagree with the statement on appendix G of the suitability study that states that Slope Percent of over 50% is unsuitable for grazing. We disagree because cattle will graze out and around to the water, if the water is available and the range properly salted, even though there is a slope steepness. The present trails and cattle signs on these slopes verify that livestock do utilize the range on 50% or more grade slope.
5. We met with the B.L.M. and Forest Service earlier on the 11 of May 1981 at the old Forest Service Building at May, Idaho on these proposals and we agreed then that there was not to be any deffered grazing or fenced pastures. At that time the B.L.M. agreed that the range was in more than satisfactory condition and the impact statement table 2-4 Chapter 11 shows that there is more available A U M's than what is currently being used on the allotment because of the good range conditions.
6. We are in agreement with the statement for the further development of ponds and pipelines as stated in Chapter 2 Table 2-7 of the impact statement for the grazing of livestock and also wild game and game birds.

We would like to invite the study group and the BLM officials to meet with us and go on horseback with us to the study area so that we can show why we do oppose some of these proposals of the draft impact statement.

Sincerely,

Jimmie J. Downton

May, Idaho 83253

March 20, 1982

To The Bureau of Land Management;

As a member of the Lawson Creek Cattle Association which is located in the Ellis-Pahsimeroi Draft Grazing Environmental Impact Statement area I would like to go on record with the following statements ;

We, the Lawson Creek Cattle Association oppose the plan of Deferred Grazing as proposed in the impact statement for our allotment for the following reasons;
1. We oppose the fencing proposed because with what water that has been developed in the past it services the grazing areas so that there is not a heavy concentration of cattle in any one area at any critical time of the year. The cattle are scattered throughout the area in order to achieve a balance with the water and grasses. If fenced it would make a heavy concentration of cattle in certain areas because of the sources of water.
2. Most of the grazing permits on this allotment run adjacent to the individual ranches which makes the gathering of the cattle easier because of the different come off dates in the spring, summer and fall of the year for the permits. Each of the grazing permits have different come off dates which makes it necessary to leave it as a non fenced pastures.
3. We also oppose the fencing which is proposed in this study because the drainage of this range isn't suitable for fencing because some of the drainage runs east and west, and other drainages run north and south which makes the fencing impractable for the proper dispersal of the cattle over the range. The permitees on the west s ide of the allotment would have difficulties dispersing their cattle to the east side of the allotment and vice versa for the east side permitees because of the inaccessability due to the termin of the mountains.
4. We disagree with the statement on appendix G of the suitability study that states that Slope Percent of over 50% is unsuitable for grazing. We disagree because cattle will graze out and around to the water, if the water is available and the range properly salted, even though there is a slope steepness. The present trails and cattle signs on these slopes verify that livestock do utilize the range on 50% or more grade slope.
5. We met with the B.L.M. and Forest Service earlier on the 11 of May 1981 at the old Forest Service Building at May,Idaho on these proposals and we agreed then that there was not to be any deffered grazing or fenced pastures. At the time the B.L.M. agreed that the range was in more than satisfactory condition and the impact statement table 2-4 Chapter 11 shows that there is more available A U M's than what is currently being used on the allotment because of the good range conditions.
6. We are in agreement with the statement for the further development of ponds and pipelines as stated in Chapter 2 Table 2-7 of the impact statement for the grazing of livestock and also wild game and game birds.

We would like to invite the study group and the BLM officials to meet with us and go on horseback with us to the study area so that we can show why we do oppose some of these proposals of the draft impact statement.

Sincerely,

Lawson Creek Ranch
Andrew Ogle
May, Idaho 83253

United States Department of Agriculture

Soil Conservation Service

Room 345
304 North 8th Street
Boise, Idaho 83702

March 22, 1982

Mr. Jerry Wilfong
EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

Thank you for the opportunity to review the Ellis-Pahsimeroi Draft Grazing Environmental Impact Statement. We have the following comments:

1. We feel the Erosion Susceptibility Map 3-2 may have some discrepancies.

13-1 a. Soil erosion hazard or erodibility is based on K factor, length and steepness of slope, rainfall intensity, and thickness of soil layer. We think these factors are quite similar for both sides of the Pahsimeroi Valley, however, the north east side of the Valley is rated as having a low hazard and the southwest side is rated as having a moderate hazard. We believe these should be rated the same. With K factors of about .15 to .21 and slopes of less than 12 percent, soils should not be very erodible.

13-2 b. The Morgan Creek area is rated as having a low susceptibility to erosion. The soils in this area again have low K factors but have slopes of 20-50 percent. We believe that, if this soil were denuded of vegetation - which is the way we rate soils for erosion hazard, it would be very susceptible to erosion.

13-3 2. In reviewing maps 3-3 and 3-4, an area of concern is brought up in T13N, R22E; T12N, R23E; and T11N, R23E. Range condition and plant community boundaries appear to be very nearly the same. In past experience, this will generally not occur, especially over such a large area. Since this land area appears to be in 3 different allotments, we wonder if management also would have been different, thus leading us to believe an error in condition may have been placed on the map.

13-4 3. The overall reduction of 4.6 percent does not appear excessive but we question the private land resource ability to absorb some of the individual reductions of 40-50 percent if the ranch operator decides to stay in business and hold his livestock on private land. Perhaps in those instances, with private land owner interest,

Mr. Jerry Wilfong
03/22/82, Page 2

3. (Cont.)

a coordinated resource management planning approach could be initiated and plans placed into implementation stage within 5 years. This may be an alternative worth looking into. Understandably, manpower from agencies involved, plus private land owner interest and financial obligations would need to be in agreement and available.

Sincerely,

Ames L. Garrison, Jr.
State Conservationist

The Soil Conservation Service is an agency of the Department of Agriculture

Response to Letter No. 13

13-1 The Erosion Susceptibility Map 3-2 is based on parametric terrain analysis procedure which classifies land units according to the severity of erosion by integrating the steepness of slope, the geologic parent materials, the USLE K factor of the soils and the type, frequency and magnitude fluvial erosion features such as gullies and actively cutting stream channels as identified and mapped through stereo aerial photo interpretation and verified through on site investigations and ground truth.

The SCS method cited for evaluating soil erosion or erodibility does not account for the fluvial features present on the south side of the Pahsimerol Valley. These are primarily small but numerous actively cutting stream channels in Quaternary and Holocene Alluvium derived from limestone/dolomite. Their presence at these locations is not as significantly related to precipitation and vegetative cover as to rising ground water in saturated calcareous alluvial materials during periods of high flows and runoff.

The density of channel erosion features on the south side of the Pahsimerol River is much greater than that on the north side of the river, where the alluvial fans of the Lemhi Range contain coarser materials derived from Belt Series Quartzites, and are better drained and more permeable to ground water movement. The differences in the Erosion Susceptibility of the mapped units on the north and south sides of the Pahsimerol River are thus believed to be accurate as portrayed in Map 3-2.

13-2 The Morgan Creek Area referred to has slopes of 20 to 50 percent low K factors and is in an area of Belt Series Quartzite geologic parent materials. Aerial photo interpretive mapping of erosional and depositional features indicates that the density of gullies is low, that almost 50 percent of this area is rock and talus, that most of the fluvial erosion in this area is in complex with the zones of rock and talus, and that the areas with soil contain significantly fewer erosion features than the larger areas of Morgan Creek with Challis Volcanic parent materials. Statistical analysis of the type and frequency of erosional features in Belt Series quartzites indicates that land areas in this geology tend to be steep but are stable even under heavily disturbed conditions. Similar analyses for Challis Volcanics show shallower slope gradients with higher numbers of features per unit area.

A ground truth of the Morgan Creek Area verifies both the indications provided by the statistical analysis and the aerial photo interpretive mapping of erosional features. It is felt the Erosion Susceptibility of Morgan Creek to be accurate as portrayed in Map 3-2. Again the SCS method of evaluating soil erosion hazard does not adequately take into account the geomorphologic or hydrologic factors which produce the complex erosional processes and land forms present in the Morgan Creek Area.

Response to Letter No. 13 (Cont.)

13-3 There are two reasons for the situation which you have recognized.

Under a given set of grazing practices, different vegetative types respond differently to grazing pressures. Some are more likely to change from fair to poor. As a result, often times condition lines follow vegetative lines.

Furthermore, in the area of concern, condition mapping preceeded range site write-ups. Sites were rated using SCS range site guides. Much of the area in question was rated against Ecological Site Description BLM-SCS-5. Later, it was discovered that this area had a sagebrush-poa spp. range site which was not described in the site descriptions provided by the SCS. This would have changed some of the boundaries to which you refer. However, the results of this change are inconsequential to management decisions.

13-4 Refer to Overview section 3.

March 23, 1982

Jerry Wilfong - Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

Thank you for the opportunity to comment on the Ellis-Pahsimeroi Draft Grazing EIS (Environmental Impact Statement). Following are comments on primarily the vegetation section of the EIS.

1.-The vegetation section (p. 4-3) states that initial stocking rates would be reduced to 26,688 AUMs (animal unit months) under the proposed alternative, and that "Vegetation would benefit from this adjustment because the stocking rate under the proposed action would not exceed production on any allotment. The long-term (20 years) effects would result in 22 percent greater vegetation production than under alternative 1." It is stressed in the EIS that the reduction in AUMs is a 4.6 percent reduction of current active preference. This reduction, however, is a theoretical reduction, because the actual grazing use (5-yr average, table 2-4) is below even the theoretical level of use (licensed preference) after the reduction. It is appalling to me that a direct, on-the-ground vegetation improvement is being predicted for a "paper" reduction in livestock use. Any improvement projected as a result of this "reduction" cannot be supported. Rather, the 20-year vegetation changes predicted for alternative 1, continuation of the present situation, are a more accurate representation of the impacts for the proposed alternative.

1-1

2.-The incorporation of grazing systems onto 25 allotments (13 deferred rotation; 12 rest-rotation) is expected to result in an improvement of the vegetation condition. This is implied in the discussion in chapter 4 (p. 4-6), and the example in appendix B (p. B-3). That vegetation improvement will occur from rotational grazing systems seems to be prevalent thinking in many BLM districts, since in almost every BLM EIS these grazing systems are presented as improvers of range condition. It is my contention that this almost universal acceptance by BLM that rotational grazing systems will improve range condition is not valid. I would like to examine some of the range management literature in explaining the basis for my contention.

Support for rotational grazing systems often comes from Hormay and Talbot, 1961 [1]*, and Hormay, 1970 (2). In his 1961 report, Hormay originally presented his theory of rest-rotation grazing from studies on the Harvey Valley cattle allotment on Lassen National Forest in Northeastern California. He stated the following:

"Selective grazing, therefore, is one of the main causes of range deterioration, and the basic problem is to change the grazing pattern so that palatable forage species can be maintained on the most heavily grazed range area. . . Under rest-rotation grazing, stocking is based on the production and use of acreage from all the available forage species and not on the key species alone. Under this system, degree of use on plants does not have the same importance as under continuous seasonal grazing, because grazing is limited to a comparatively short time and is always followed by rest planned to be long enough to overcome the harmful effects of grazing. . .Further, under rest-rotation grazing little attention is paid to classifying plants according to palatability to determine forage production and stocking. . .Species rated low in palatability are often grazed as closely as species rated high. . . A fairly high stocking rate forces greater use of the less palatable forage species and the less accessible grazing areas. . ." (pp. 32-35)

* Numbers in brackets refer to entries in the bibliography.

Hormay concluded his report with the following statements:

> "A practical test of the system is now in progress on the Harvey Valley cattle allotment of the Lassen National Forest. Since results from this test are not available, the merits of rest-rotation grazing cannot be fully evaluated at this time."

As you can see, the 1961 Hormay report did not provide proof that rest-rotation grazing is more beneficial to vegetation than moderate, continuous grazing. We must look elsewhere for proof.

The grazing system studies at Harvey Valley allotment in Northeastern California were continued through the 1970's. In 1974, Ratliff and Reppert [3], reported on the study, and their results are extremely suprising. Based on data collected from 1965 to 1969, the following conclusions were stated:

> "Continuous grazing, therefore, appears to be more effective in controlling competing vegetation than it is damaging to Idaho fescue."
>
> ". . .Idaho fescue can apparently maintain its vigor and reproduce under moderate, continuous grazing."
>
> "It appears, however, that range managers cannot key saad production into a set program of rest-rotation grazing."
>
> "Further, the full use treatments did not reduce nor did full-season rest improve Idaho fescue vigor on the Harvey Valley(rest-rotation) plots." (p. 449)

It is my opinion, based on the research I am citing, that predictions of vegetation improvement from reet-rotation and dafarred-rotation grazing systems cannot be sciantifically supported. This is clearly avidenced by Ratliff's and Reppert's conclusions, which are directly opposite of soma of the premises Hormay put forth in his 1961 and 1970 discussions of the "theory" of rotational grazing.

I would like the author of the vegatation section of the EIS to

comment on the following research in justifying his expectad vegetation improvement due to implementation of grazing systems:

> • Hydar and Sawyer, 1951 [4], in a 11-year study of the affects on vegetation of season-long vs. rotation-deferred grazing systems in a mixed sagebrush-bunchgrass plant community, found that the density of grasses had increased to a greater extent under season-long grazing by the end of the study period, than under the deferred-rotation grazing systems.

14-2

> • A 5-year study, done by Currie, 1976 [5], found that systems of rotational grazing use did not influence herbage yields, basal areas, or plant densities of perennial bunchgrasses. Currie stated that "No season or system of grazing was any more efficient than others, including complete protection, in promoting recovary. Thus instituting a complex rotation or management system is questionable management practica for promoting improvement or recovery of pine-bunchgrass ranges." (p. 448)

In discussing the use of spacialized grazing systems, Stoddart, Smith, and Box, 1975 [6], stated that "there is little doubt that grazing systems result in better distribution of livestock and more uniform utilization of tha range. Their beneficial effect on vegetation is less clear. . .From tha data on hand it cannot be catagorically stated that a rotation-grazing system will invariably improve the range or give greater livestock production than modarate, continuous seasonal grazing." (p. 297)

I will appraciate your serious responss to tha points I have raised in this comment, in light of section 1502.24 of the Regulations for

Implementing NEPA (43 FR 55978-56007, November 29, 1978), which states that "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements."

3.-The vegetation section (p. 4-5) states that "The season of grazing is important because forage plants depend on carbohydrate reserves to start growth in the spring. . . Delayed turnout would provide plants a chance to develop anough photosynthatic tissue to be self-sustaining and not be dependent on root reserves." Page 3-8 states that: "Grazing during the spring, when plants are drawing heavily on root storage, can daplete carbohydrate reserves and leave the plant low in vigor. Typical grass species stop drawing on reserves and start building root reserves at about tha four leaf emergence state (Cook 1966)."

14-3

The analysis of these sections seems to be aimed at supporting grazing after range readiness, which I understood to be standard BLM policy. Stoddart, Smith, and Box, 1975 [6], state concerning range readiness that "Early-maturing species such as Koeleria cristata, Poa fandleriana, P. secunda, and Bromus tectorum usually will have started to produce flower heads by the time stock should go on the range. Grasses that mature later, such as Agropyron spp., Bromus spp., and Stipa spp., will not have shown any flower heads, but the foliage will usually have reached a haight of 6 in. or more." (pp. 278-279). Does grazing use occur before this period in the Ellis-Pahsimeroi EIS area?

I would like to stress that early spring use (before range readiness) is not the only highly detrimental use period in plant growth. The predormancy period is important (the period after flowering and preceding dormancy) because it is at this period whan growth is slow and

tha carbohydrate reserves which have been used for earliar growth and flowering are being restored. Predormancy defoliation causes tha grass to utiliza its stored reserves in an attempt to regrow before dormancy. It often happens that there is insufficient time for the plant to regrow to tha point that it can restora its daplated reserves. Tha result is that the plant enters the dormancy period with an inadaquate reserve leval, a condition which reducas the vigor of the plant, and, if continued, will result in its death. The "regrowth" I am referring to is not regrowth due to fall precipitation, but regrowth before the spring and early summar growing season has endad. It is my opinion that the optimum season of use of a perennial grass is after range readiness, yet early in the season, followed by rest before the dormancy period. This allows the plant to regrow and restora its carbohydrate reserves after dafoliation, so that vigor of the plant is not affacted.

It is important to understand that improvements in plant vigor resulting from early season grazing, followed by predormancy rest, as described above, will be negligible if the plant is used before range readiness, and if the plant is utilized at a level that is greater than propar use(40 to 60% utilization).

Support for the above discussion is found in the following references: Weinmann, 1961 [7], Cook, 1966 [8], Kinsinger and Hopkins, 1961 [9], Trlica and Cook, 1971 [10], 1972 [11], McCarty and Price, 1942 [12], Blaisdell and Pechanec, 1949 [13], and Mueggler, 1967 [14].

I am looking forward to your sincare consideration of my comments on the Ellis-Pahsimeroi Draft Grazing EIS.

Sincerely yours;

J. Ratzloff

1388 Garrison, # 6107
Lakewood, Colorado 80215

Bibliography

[1] Hormay, A.L., and Talbot, M.W. 1961. "Rest-rotation grazing--a new management system for perennial bunchgrass ranges." USDA Prod. Res. Rep. 51.

[2] Hormay, A.L. 1970. "Principles of rest-rotation grazing and multiple-use land management. USDA, For. Serv. Training Text 4 (2200)

[3] Ratliff, R.D., and Reppert, J.N. 1974. Vigor of Idaho fescue grazed under rest-rotation and continuous grazing. J. Range Manage. 27(6): 447-449.

[4] Hyder, D.N., and Sawyer, W.A. 1951. Rotation-deferred grazing as compared to season-long grazing on sagebrush-bunchgrass ranges in Oregon. J. Range Manage. 4(1): 30-34.

[5] Currie, P.O. 1976. Recovery of ponderosa pine-bunchgrass ranges through grazing and herbicide or fertilizer treatments. J. Range Manage. 25(6): 444-448.

[6] Stoddart, L.A., Smith, A.D., and Box, T.W. 1975(3rd Ed.), Range Management. McGraw-Hill Book Co., New York.

[7] Weinmann, H. 1961. Total available carbohydrates in grasses and legumes. Herb. Abst. 31(4): 255-261.

[8] Cook, C.W. 1966. Carbohydrate reserves in plants. Utah Agr. Exp. Sta. Utah Resource Series No. 31.

[9] Kinsinger, F.W., and Hopkins, H.H. 1961. Carbohydrate content of underground parts of grasses as affected by clipping. J. Range Manage. 41, p. 9-12.

[10,11] Trlica, M.J., Jr., and Cook, C.W.

1971. Defoliation effects on carbohydrates of desert species. J. Range Manage. Vol. 24, 418-425.

1972. Carbohydrate reserves of crested wheatgrass and Russian wildrye as influenced by development and defoliation. J. Range Manage. 25(6).

[12] McCarty, E.C., and Price, R. 1942. Growth and carbohydrate content of important mountain forage plants in Central Utah, as affected by clipping and grazing. U.S. Dept. Agr. Tech. Bull. 818.

[13] Blaisdell, J.P., and Pechanec, J.F. 1949. Effects of herbage removal at various dates on vigor of bluebunch wheatgrass and arrowleaf balsamroot. Ecology 30(3): 298-305.

[14] Mueggler, W.F. 1967. Response of mountain grassland vegetation to clipping in Southwestern Montana. Ecology, 48(6).

Response to Letter No. 14

14-1 This proposal is not a "paper" reduction. Total 5 year average licensed use is lower due to total or partial non-use by some permittees in various years.

There is a big difference between this and actual reductions on allotments that show resource conflicts.

Looking at the proposed forage allocation for each allotment versus 5 year average use (Table 2-4) shows those allotments proposed for reductions have had higher 5 year average licensed use. Those are the allotments that show problems and therefore the projected range betterment from these actual cuts is very real and is supported.

14-2 We admit that Rotational grazing is not suited for all areas. Further, we don't expect that every acre will improve but our experience with grazing systems shows high success here in our area.

Anderson (1967) in his article entitled Rotation of Deferred Grazing states:

> "Properly applied, rotation of deferred grazing is practical and highly beneficial, both economically and biologically."
>
> "Across the range country rotation of Deferred Grazing is known by a variety of names. These include: Deferred-Rotation Grazing, Rotated Deferred Grazing, Rotation-Deferred Grazing, Rest-Rotation Grazing, and probably others."

Heady (1961) explains why grazing systems may show significant results in land management when experimental tests have not proved them superior to continuous grazing: "The answer probably lies in other features of management. When a rancher begins a deferred-rotation system, he usually changes stocking rate, improves the distribution of animals, controls brush, reseeds, etc. In experiments these factors are held constant. The difference in results between grazing experiments and general application may be due to these practices and not to the grazing system."

We have two allotments that have been operating under rest-rotation grazing systems for 5 years; Cable Creek and Morgan Creek. The results of our 1979 range inventory revealed substantial increases in vegetative production on these allotments.

We are convinced, based on the results of the grazing systems we have implemented, that specialized systems are a valuable management tool for the Ellis-Pahsimerol Resource Area.

In the development of a grazing system, we take into account most if not all of the "features of management" discussed by Heady.

Response to Letter No. 14 (Cont.)

14-3 Current turn-out dates are tied as close as possible to range readiness. However, due to yearly climate changes stage of growth may be above or below the ready stage at the time of turn-out our phenology data provides us the necessary information to assure proper grazing seasons.

Through years of on-the-ground experience, we know that our grazing seasons provide the majority of our acreage with adequate use/rest periods. Those places identified as having resource problems will be the first brought into line through more intensive range management.

United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

1202-03(PNR-E)
DES-82/3

March 23, 1982

Memorandum

To: Acting District Manager, Bureau of Land Management, Salmon, Idaho

From: Acting Associate Regional Director, External Services, Pacific Northwest Region

Subject: Ellis-Pahsimerol Draft Grazing Environmental Impact Statement

We have reviewed the subject document as requested and find that

impacts to recreational and cultural values are adequately addressed.

Richard L. Winters

Richard L. Winters

(2)

The critical deer range in Iron Creek is not on BLM. XXX It's the West fork of Iron Creek and the Badger basin area. The yea s of heavy snow when ite crusts the deer move down to the rockey mahogany points.

Before they started building roads and logging,in the 1950's, there was five deer tohns as of now . The greatest impact on the game has been accesss. There never has been any concern to winter feed the game.

In your own figures in table B2 90% of deers fall and winter diet is shrubs.

Another influencing factor in the north $\frac{1}{2}$ of the Cabin Creek and all the Iron Creek allotment is the heavier moistgure belt we are in.

The gist I get from the Impact Statement, in light of past preformance, is mostly hoped for improvements ~~xxxxxx~~ in range - game - and dollars in the ranchers pocket.

The only part of my range that should be put under rest rotation is that used after June 1.

There is atleast 150 more AUM s in the Lime Creek Allotment. It was the old Warm Spring Allotment which was lost when Elk Bend came ito being.

Eugene L Hussey

Eugene Hussey
Iron Creek
Salmon,Idaho
March 25 1982

Jerry Wolfong
Dear Sir:

The first thing missing in the Impact Statement is any history of past use.

My father -Frank Hussey- came to the area in 1911 and purchased the Iron Creek ranch in 1918.

Some of the history we have known follows.

The water right for our place is dated 1888.

Turn out date until 1943 was 1 st of April or before.

In the early teens through the earley twentys, Shoup turned out about 2500 head of cattle between Rattlesnake creek and Hat creek.

From the late 20's through early 30's - 500 head of cattle from my upper place on Iron creek.

Iron - Deer Creek Area

Frank Hussey - 1920's through 1950's . Wintered 60 to 100 head of horses - Turned out 100 ~~xx~~ to 200 of cattle - 100 to 200 head of sheep.

Joe Chod - 200 head of sheep spring through fall mid 20's through 1930's.

Dave White wintered 30 to 40 head of horses through the 1940's.

Ed Benjamen ran 70 head of cows inthe late 1930's through 1940's.

Rattlesnake Creek Area

Charlie Kamps - 1920's through 1940's - wintered 50 or more horess and 150 head of cattle.

Mike Loening through the 1950's did the same.

Trespass in Beer- Rattlesnake creek area. Last 13 years.

Three years Jack Ohmahundrn 60 to 100 head of cows 20 to 30 head of ~~xxxxxx~~ horses.

Chuck Wilmore has had 20 to 60 head of horses since then with no fences.

To my knowledge the Bureau has done nothing toward the trespass. During the same time the Bureau has completed a fair size land exchange with no public notice or input.

The last 20 years 1200 AUM has been permitted; the grasing capacity by BLM survey 1600 AUM.

If you rolled the Iron Creek allotment out flat, there would be 30% or more range to consider.

No serious erosion shows after 100 years of heavy use by livestock and game.

The past 13 years the Bureau has refused any range improvements. They even refused forty rods of temperary electrical fence to be put in and removed by me last year.

Salmon LEMHI COUNTY CATTLE & HORSE GROWERS ASSOCIATION

SALMON, IDAHO - 83467

Bureau of Land Management
Salmon District
% Jerry Wilfong, EIS Team Leader
P.O. Box 430
Salmon, Idaho 83467

Gentlemen:

The Lemhi Cattle and Horse Growers Association is very concerned about part of the Ellis-Pahsimerol EIS: specifically, the criteria used in appendix C, page C1, in determining suitability for grazing. On many ranges, cattle have been grazing slopes far in excess of 50% for years without adverse effects to the range. Thus, to use a hard and fast rule that anything over 50% is unsuitable for grazing is unreasonable and indicative of a blindness to fact.

The Cattlemen's Association feels that the proper method for determining proper grazing rate is by closely observing the current condition and the long range trend of the range. If condition and trend are static or improving, then no reduction in the stocking rate would be in order. Likewise, if there is deterioration in the range condition, then - but only then - some reduction is justified.

Less than 7% of Lemhi County is private land, so grazing of public lands is vital to the continuation of a strong livestock industry, and the beef animal is unique in that it's adept to grazing rough, hilly land not suited to other types of agriculture. Any action by the B.L.M. which reduces the amount of livestock grazing on public lands will have severe repercussions throughout the economy of Lemhi County.

Sincerely,

Mike Overacker, Jr.
Secretary-Treasurer
Lemhi Cattle & Horse Growers Association

MO:ih

March 20, 1982

To The Bureau of Land Management;

As a member of the Lemmon Creek Cattle Association which is located in the Ellis-Pahsimerol Draft Grazing Environmental Impact Statement area I would like to go on record with the following statements ;

We, the Lemmon Creek Cattle Association oppose the plan of Deferred Grazing as proposed in the impact statement for our allotment for the following reasons;

1. We oppose the fencing proposed because with what water that has been developed in the past it services the grazing areas so that there is not a heavy concentration of cattle in any one area at any critical time of the year. The cattle are scattered throughout the area in order to achieve a balance with the water and grasses. If fenced it would make a heavy concentration of cattle in certain areas because of the sources of water.

2. Most of the grazing permits on this allotment run adjacent to the individual ranches which makes the gathering of the cattle easier because of the different ones off dates in the spring, summer and fall of the year for the permits.. Each of the grazing permits have different ones off dates which makes it necessary to leave it as a non fenced pastures.

3. We also oppose the fencing which is proposed in this study because the drainage of this range isn't suitable for fencing because some of the drainage runs east and west, and other drainages run north and south which makes the fencing impractable for the proper dispersal of the cattle over the range. The permitees on the west side of the allotment would have difficulties dispersing their cattle to the east side of the allotment and vice versa for the east side permitees because of the inaccessability due to the termin of the mountains.

4. We disagree with the statement on appendix C of the suitability study that states that Slope Percent of over 50% is unsuitable for grazing. We disagree because cattle will graze out and around to the water, if the water is available and the range properly salted, even though there is a slope steepness. The present trails and cattle signs on these slopes verify that livestock do utilize the range on 50% or more grade slope.

5. We met with the B.L.M. and Forest Service earlier on the 11 of May 1981 at the old Forest Service Building at May, Idaho on these proposals and we agreed then that there was not to be any deffered grazing or fenced pasture. At that time the B.L.M. agreed that the range was in sore than satisfactory condition and the impact statement table 2-8 Chapter 11 shows that there is more available A U P/M than what is currently being used on the allotment because of the good range conditions.

6. We are in agreement with the statement for the further development of ponds and pipelines as stated in Chapter 2 table 2-7 of the impact statement for the grazing of livestock and also wild game and game birds.

We would like to invite the study group and the BLM officials to meet with us and go on horseback with us to the study area so that we can show why we do oppose some of these proposals of the draft impact statement.

Sincerely,

E. D. Tolman

March 29, 1982

Dear Sirs,

I am writing this letter as an interested private citizen, concerned with the impact the Ellis-Pahsimerol Draft Grazing EIS will have on our area's local economy.

I have read the EIS & attended one meeting with ranchers, BLM personnel & others in attendance at Dubois to discuss the proposals.

Of only alternative 2 do I believe to be feasable at this time as alternative #1 - no change - the EIS makes several statements that the range is improving overall & that vegetation is good to excellent in most areas. However I have also noticed many inconsistencies that those ranchers who gave testony on their past range management practices disagreed on. Many areas are also plagued on the Ba ins ground most of the permit holders (perhaps all of them) have already taken cuts in the # of AUM's they held or will take a number of steps throughout the range. Any further cutbacks are not warranted.

Most of the figures used in the EIS appear to have been pulled out of a hat or lifted from other studies. Most of the studies don't address locations or ranges specifically to the area in this area. Not specific to your reference section you list.

Agropyron shrub & cattle relationships in Carbon Co., Montana 1970.

Potential soil erosion of selected habitat types — of Central Oregon.

Studies of wet station grazing — in Northern Nevada.

Ground water in Pahsimerol Valley 1924.

The influence of cattle management on deer & elk 1968 etc. etc. Very little of the reference material is found on Deer, Elk or Ellis-Pahsimerol area supposedly under study.

A study of this magnitude can't be accomplished in the time you took to prepare it. Each individual took to prepare it. Each individual took to prepare it. Each individual

them to give us AUM's is a real slap in the face & a fine way to say thank you.

I also did what as my range consultant I could since I'm about with the permittee. & I know the needs of this range intimately & could justify BLM personnel's stance if the other way around. Much of the range in the E/C has not been troubled by your agency. I draw that conclusion from your condition analysis maps & charts which do it seem to be accurate. Im also concerned about the cost & priority concerning range improvements. Will work on range improvements occurring before permanent cuts occurring slowly, have will cuts not be enough? Repeatedly for the improvements? I used the word assumed during the statement. mainly during range.

I also told Colyer the proposed that any ground with a 60% slope not to be substitute for range. It is foolish much of the AUM's ground available would have to be fenced off & that is impractical. The livestock will not graze the steeps, stock will not graze ground under the trees, accessible ground is gone & the steeps & timber is all that's left. I cannot see the idea of these problems your present on your maps.

Just suppose we remove the livestock from this reason susceptible

a few more dollars spent by BLM locally would absorb a boost to our area back 9 years how little you actually spend here.

Lorna C Gibbs

Bob & Leona Gibbs
STAR ROUTE Box 151
Salmon Idaho 83467

ground. Who's going to kill the wildlife to stay fed? Maybe we should save all that grass & fuel for the range fires. Personally I'd rather see the grass used by livestock & game until ultimately it's not enough to feed the hungry people instead of hungry fires.

In Chapter 5, under social conditions, you state for some of the permittees their livestock operations are a hobby. What does that have to do with the statement? I can't see how that has any bearing on the statement & should not have been included.

In conclusion I feel the study was poorly executed & lacked research & relevant & valuable information. The document is repetitious, vague, & inconsistent. The chart understatement, especially the & graphs. Aren't they supposed to simplify things? Where are the budgets & projected economic impacts are duly stated assumptions. The crystal ball you used would suit be a help to the ranchers who are going to be affected by your study. It's now difficult to make long range plans to make a living. Please don't forget our local merchants here in Salmon. A cut to the rancher means a cut to the merchant.

Clyde & Jan Phillips
Star Route, Box 117
Salmon, Idaho 83467

March 27, 1982

Jerry Wilfong, EIS Team Leader
Bureau of Land Management
P.O. Box 430
Salmon, Idaho

The following is a list of my objections to the writing of the Ellis Fahsimeroi E.I.S.

(1) According to the E.I.S. there is 380,458 acres in the Ellis Fahsimeroi Unit (ix). The acreage was figured using measurements from aerial photos and maps. Measuring from photos and maps does not compensate for the actual slope or termin. Maps are flat. If land is actually surveyed instead of measured on maps there would be as much as 30% more acreage. Therefore the acreage is probably substantially more, meaning more AUMs available for grazing.

(2) According to table (2-9) there is 223,049 AUMs of total production in the E.I.S. Unit. It also states 195,070 AUMs are nonconsumptive, leaving 27,979 AUMs allocated for grazing. I feel somewhere in your equations and formulas you have over allocated nonconsumptive AUMs. Surely more than 12% of total production is consumptive & usable for livestock grazing. I cannot believe 88% of total production is needed for watershed protection and wildlife cover.

2-1 (3) The B.L.M. feels that by allocating 2,751 AUMs to wildlife they will increase in numbers from 10% to 20% by species over the present situation, table (2-9). Apparently the B.L.M. is trying to tell us that our wildlife are starved down to their present populations. If we have 195,070 AUMs of nonconsumptive forage in the E.I.S. Unit, how could wildlife be lacking for food? I am certain they don't know the difference between consumptive and nonconsumptive AUMs.

Therefore it must be some other environmental factor limiting a population increase. Such as predation or too many roads and too much accessibility during hunting season. If the B.L.M. wants increased wildlife, they should close some roads and start controlling the coyotes.

2-2 (4) According to the E.I.S. the palatable vegetation is used by livestock and wildlife. However livestock are not allocated vegetation in unsuitable areas, but wildlife are. Therefore to avoid over allocation to wildlife, their vegetal requirements (by class) were determined only on suitable livestock range, before the allocation process. Some, all wildlife forage requirements used were competitive with livestock (2-9).

2-3 If wildlife admittedly eat on unsuitable range, why should their vegetal requirements be deducted only from suitable livestock range?

2-4 (5) The E.I.S. states that in the short term, ranchers income will increase by $1,000.00. How can a reduction in cattle numbers result in an increase in income? It also says long term income will increase by $57,000.00. It would be nice if a rancher could depend on that, but we all know there is no way to estimate ranch income. There are too many variables involved. I noted no piece

in the E.I.S. where it guaranteed the ranchar would be allocated AUMs lost to the impact statement, let alone any additional AUMs in forage allocation, to account for a $57,000.00 increase in the ranchers income.

(6) Appendix (C) states suitability should be dropped altogether. There is no scientific basis to substantiate suitability. We all know it is not correct or valid. The B.L.M. cannot even say where it's origin is.

(7) The difference between the proposed action and Alternatives 1,2,4,5 are minimal. There would be an increase of 1% in condition improvement range between the Proposed Action and the Alternatives (Table 2-9). All other categories are very similar. It would appear since all figures are merely predictions and assumptions, precise assessments cannot be determined until several years after implementation (2-21). It would be better to remain at the current situation and make range improvements and developments to increase forage available and improve conditions.

(8) The E.I.S. Proposed Action calls for $618,000.00 to be spent on range improvements and developments resulting in an increase of 8,127 AUMs available for livestock within a 20 year time frame. Then it states, it is assumed the B.L.M. would have the funding to develop and implement the livestock management systems described in the Proposed Action or Alternatives 1,2,4, or 5. It is also assumed that the B.L.M. would have the funding and personnel required to carry out the monitoring and make adjustments in areas where multiple use objectives are being met (4-1). It really doesn't appear the funding will be available; why should anyone accept a reduction with only a verbal promise of improvements to restore the lost AUMs. Any cut should only be accepted upon a written guarantee of improvements and a reasonable time frame for their implementation and resulting increase in AUMs.

(9) In summary, I would like to use the E.I.S. statements own terminology. Anticipated impacts (4-1), expected to occur (4-1), could result upon an assessment (4-2). Projections for (4-1, the formula estimates (B-2), were derived from projections (B-3), making estimates of how these costs would be distributed (K-3), resulting in a set of assumptions (B-3). Ecological condition was predicted (B-3), cover and productivity estimates were derived (B-3), and assumption was made (B-3), deer would probably increase (4-26), because additional AUMs should be available (4-3).

I could go on, but I feel the point is made. The E.I.S. is based on assumption, estimation, projection, and prediction. Definitely not fact. The only way to properly evaluate range is by condition and trend and according to B.L.M. information, condition is satisfactory and trend is static or improving on all but a few minimal acreages.

There are no allotments where watershed conditions are deteriorating (X). The long term affects of many of the Alternatives are not widely dissimilar (with the exception of Alternative 3). This is a reflection of the low magnitude of problems in the E.I.S. area (X1). This level of grazing has been maintained since 1959 with only minimal management resulting in few adverse consequenses (4-29).

Therefore, I believe Alternative 1 or 2 should be adopted, with implementation of improvements to procede under mutual consent of the rancher and the B.L.M. as funds are available.

Sincerely,

Clyde & Jan Phillips

IDAHO DEPARTMENT OF FISH AND GAME
600 South Walnut • Box 25
Boise • Idaho • 83707

March 29, 1982

Mr. Jerry Wilfong
EIS Team Leader
U.S. Bureau of Land Management
Box 430
Salmon, ID 83467

Dear Mr. Wilfong:

Following our review of the Ellis-Pahsimeroi draft grazing EIS we wish to make the following comments.

General Comments

In our overall analysis of the proposed action and alternatives presented, we find an unusual amount of similarity except for Alternative 3, the "No Grazing" alternative. The primary difference among the alternatives is in the time criteria for implementing range improvements and adjusting livestock allocations. Over the long-term period, benefits to fish and wildlife resources will be limited.

It now appears that funding for renewable resource improvements on BLM-administered lands is going to be drastically reduced. In the event range improvement projects are not funded, what steps will the BLM undertake to improve range conditions? We are especially concerned about the implementation of rest rotation or deferred rotation systems on critical wildlife habitat areas. It is well documented that wildlife dependent on the grazed pastures can experience severe competition for forage, cover and space from livestock. One potential problem would be the Donkey Hills elk winter range, which appears to be scheduled for a rest rotation system. We feel that all critical wildlife areas which may be impacted by a change to a grazing system should be identified by allotment number in the draft EIS.

21-1 21-2 21-3 21-4

Response to Letter No. 21

21-1 See, R-1

21-2 There are many verbales influencing big game population levels in addition to livestock. That is why that even with total livestock removal (Alternative 3, Table 2-9) there would be comparitively small numerical increases in big game over Alternative 1 and the Proposed Action.

21-3 Only 57% of the AUM's allocated to wildlife came from suitable cattle range (Table 2-3).

21-4 The Proposed Action would result in an overall 1 percent increase in AUMs above the 5-year average use. Based on ranch budgets and linear programming analysis this would result in a $1,000 per year income increase. The economics portion of this EIS was based on the assumption that the projected AUMs would be made available and that the ranchers would use them.

Specific Comments

Chapter II, DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES.

Page 2-2, table 2-2. Antelope numbers are incorrect. Department figures by management unit are:

22-3

Unit 37 - 800
Unit 37A - 325
Unit 51 - 400 (animals moving from upper Little Lost to 1,525 Pahsimeroi)

Page 2-8, Range Improvements and Land Treatments. The proposed action calls for the construction of 89 miles of fences in an area of critical importance for pronghorn antelope and an area used by deer, elk and bighorn sheep. The location and types of fences constructed are of major concern to ensure that big game are not excluded from critical use areas.

22-4

Page 2-8, Pipeline Development. It is encouraging to see that the BLM is addressing the problem of water availability for wildlife species along pipelines and water structures. We anticipate close coordination in this matter.

Page 2-11, Vegetative Manipulation. Land treatment projects are not described in relation to sage grouse strutting grounds. No such treatments should occur within two miles of active strutting grounds. Also, there is no provision made for minimum canopy coverage of sagebrush for wintering antelope.

22-5

Page 2-13, Monitoring Programs. If key areas to be monitored are not selected in sensitive areas, conceivably these areas could be degraded or destroyed while selected areas are indicating proper use.

Chapter III, AFFECTED ENVIRONMENT.

Page 3-6, Vegetation. The riparian vegetation zone has been omitted from this section. Because of its sensitivity to habitat needs for fish and wildlife, this vegetative type should be included.

22-6

Page 3-13, Aquatic. Fish resources are not addressed in the EIS. Although the presence of anadromous fish in the Pahsimeroi River was mentioned, no reference was made to the importance of the main Salmon River and tributaries for both existing populations of anadromous fish and potential habitat. 22-7

Chapter IV, ENVIRONMENTAL CONSEQUENCES.

Page 4-10, Grazing Management. The volume of grass consumed by deer during the winter months is minimal. We do not agree that 20-30% sagebrush intake is harmful to deer. 22-8

Page 4-14, Aquatic. From the information provided there is no way to determine the effects of the proposed action and alternatives on fish resources. Impacts from grazing management programs on riparian zones can be major unless adequate controls are implemented. We are supportive of the protection provided for Burnt Creek, but feel it should be expanded to other riparian areas such as Mahogany Creek. 22-9

Thank you for the opportunity to review and comment on this document.

Sincerely,

for Jerry H. Conley
Director

cc: Clearinghouse
USFWS (Buechler)
Wildlife Management Institute
(Bill Motze)
Region 6

Response to Letter No. 22

22-1 In order to have a firm base for environmental analysis, it had to be assumed that funding would be available for the identified projects. However, it cannot be assured that this will be the case.

In choosing between the Proposed Action and the 5 Alternatives, the decision maker will take this situation into account. What projects are needed will perhaps be funded at least in part by the benefiting operator, the local Advisory Board, etc.

22-2 Table added to show critical wildlife areas under grazing systems.

22-3 Antelope numbers shown in Table 2-2 were obtained from the Idaho Department of Fish and Game. It is felt that the difference between the two population figures is a result of antelope utilizing USFS land instead of public land during the summer.

22-4 The concern regarding fencing is recognized (see paragraph 1 page 2-10 and paragraph 1 page 4-10). The Idaho Department of Fish and Game will be requested to make appropriate comments during the environmental assessment process.

22-5 It is generally recognized that most nesting by sagegrouse occurs within two miles of strutting grounds. Nesting cover has been addressed both directly and indirectly on page 2-11.

22-6 Riparian vegetation is one of the components included in the aquatic habitat rating (Tables 3-6, 3-7). The aquatic survey forms and techniques were not included in the appendix. Also the USA is much more complete and can be requested from the Salmon District for a more detailed description of the aquatic and riparian survey.

22-7 Table 3-6 and Table 3-7 presents the overall anadromous habitat condition and potential spawning and rearing habitat for all streams in the Ellis-Pahsimeroi including the Salmon River and tributaries. As shown in Table 3-7 livestock use is not the problem on most streams. Change in livestock management will not impact fisheries to any significant degree except on Burnt Creek and Mahogany Creek. These two streams are analyzed in the EIS.

22-8 The literature adequately supports the proposition that 20-30% sagebrush in the diet is harmful to deer. For allocation purposes however, we used a shrub intake rate for winter and spring of 83% (50% sagebrush) and 47% (26% sagebrush) respectively. These figures were obtained by averaging findings of M.S. studies by Money, Nicholson and Moir from the upper Pahsimeroi and Qvale, Wintinger and Lauer from the East Fork of the Salmon River.

22-9 See response 22-7

IDAHO STATE HISTORICAL SOCIETY
610 NORTH JULIA DAVIS DRIVE BOISE, IDAHO 83706
March 26, 1982

STATE MUSEUM

Jerry Wilfong
EIS Team Leader
Bureau of Land Management
Box 430
Salmon, Idaho 83467

Dear Mr. Wilfong:

We have reviewed the draft environmental impact statement on proposed range management in the Ellis-Pahsimeroi area of Central Idaho.

We find the statements concerning cultural resources to be adequate and, in particular, support the policy of requiring cultural resource clearances for all projects. We would recommend that it also be stipulated that the survey and mitigation procedures for each project be submitted to a report to us for our review. This survey, mitigation and review process, if conducted far enough in advance with adequately trained people doing the on-site inspection, should not cause an untimely interruption in the project schedule. 23-1

Please feel free to call me if you have any questions regarding this comment.

Sincerely,

Thomas Green

Thomas Green
State Archeologist
State Historic Preservation Office

Response to Letter No. 23

23-1 The district archaeologist reviewed this comment and felt that Standard Operating Procedures, Numbers 3 and 4 (page 2-12) adequately covered BLM responsibility for coordination with the State Historic Preservation Office.

Mar 27 1982
Hay, Idaho

Dear Mr. Wilfong,

I am addressing you as E.I.S. team leader, Bureau of Land Management at Salmon, Idaho.

I submit to you the that that in your studies in the preparation of the the E.I.S. for the Elkhorn-Pahsimeroi Area you left out, or overlooked the most authentic and reliable source of information that you could have had.

This source is the knowledge owned by the livestock users in general. A knowledge acquired by many years of actual contact with the range and all of its related benefits and problems.

And I also submit that this knowledge is quite different from what can be acquired by a cram course of very few years in a center where all knowledge is supposed to be concentrated but it is not possible to concentrate all knowledge in one place.

I am 67 years old and have lived all of my adult life in Lemhi County except the War years.

I was not consulted, in the study of the Range Use, to make any conclusions of import.

I feel that that was the general way in which the E.I.S. study was conducted in regard to input from the source most closely connected with the Range.

This source also has the longest Historical Background.

There is only on thing that is certian about the Area and the conditions which are trying to be dealt with.

and that is that they conditions are going to change.

I suggest it is and will be much like riding a bucking bull. You have to be flexible and be able to make adjustments as you go along. The bull like the range environment is free to change directions and change the rules at any time.

Much effort and money and resources has been spent to try and make rules to fit a changing situation.

This is an exercise in futility.

The bull rider has about one rule and that is to concentrate on what is going on at that instant and be able to change quickly for what happens the next instant and that requires flexibility in thinking and observation.

While the range problems may not come and go that fast, they will come and go.

The best decisions would be made by the combined knowledge and skills of those interested and concerned about the Range.

There is no way a few team members can have all the facts by just their own efforts.

The United States is governed largely by a concensus arrived at in Wash. D.C. on an almost daily basis, the decision process never quits, we play it by ear.

I would be satisfied if everyone concerned would meet on the spot about which we are concerned and reach a consensus on what is self evident. Some may think that is not possible.

That is what King George and others that had the founders of the United States wrote the King and others a letter which began this way, "We hold these truths to be self evident etc."

So they were able to do what was self-evident and so can we who are concerned in these matters, such as the grass stock man the sports man the environmentalist and so on

Now for one problem that obtains in regard to my use of the Mohogany Creek allotment.

The criteria by which the amount of usage is determined for me is based on the assumption that I have a cow-calf operation which requires an 1000 to 1100-lb cow and calf and I have been allowed 50 lbs. per month to equal 50 a.u.m.'s per month. If I actually put on the range approximately 1/3 yearlings which consume about 6 a.u.m. 1/3 2 yr. old which consume about .8 a.u.m. and 1/3 2½ year old.

which may consume about 1 a.u.m. with 30 calves.

This translates into roughly 40 a.u.ms that I actually use.

Yet I am confronted with being cut 10 head because I do not have enough acres of range. I am told, A hard and inflexible rule, being applied.

No determination has been made as to whether or not the range is improving or static to my knowledge.

During the 1981 grazing season it was not posable for the 50 head to utilize the available forage.

March 29, 1982

Bureau of Land Management
Salmon District Office
P. O. Box 631
Salmon, Idaho 83467

Gentlemen;

We appreciate the work that has gone into the Allis-Arsimeni Draft Grazing Environment Impact Statement, although we cannot agree with all of its contents and results.

We feel that the Proposed Action of the B L M, by decreasing the AUM's, would create a financial handship on many, if not all, the permittees involved. In these times of depressed economic conditions, the ranchers do no need further financial handships.

We realize in the Allison Creek Allotment, of which we are users, there are some problems, but we feel sure that if the B L M could work with us on a personal basis, these problems could be resolved. We also strongly protest the 50 percent slope unsuitability for livestock grazing. We consider it totally unfair and impossible to enforce, ahead of implementing Alternative #3 (Heaven Forbid).

We are in favor of Alternative #1 - No Change - but with more cooperation and personal relationships between B.L.M and Range Users being attained, instead of more restrictions hindering the rancher, resulting in higher expenses.

We found it curious to note that although you dropped the Perimm Livestock Utilization Alternative because it was not a multiple use recommendation, that you did not drop Alternative #3 for the same reason.

Sincerely,
Lorraine M. Miller
Albert G. Miller

Lorraine M. Miller
Star Route Box 175
Salmon, Idaho 83467

Thanks for listening

Ben White

Salmon, Idaho
March 27, 1982

Jerry Wilfong, R I S Team Leader
Bureau of Land Management
Salmon, Idaho 83467

Dear Sir:

I would like to make the following comments on the proposed R I S regarding the Poison Creek Allotment.

We see no reason to change from the present seasonal grazing system, which we have used for more than the past thirty years, as the vegetal condition on our range is very good, the ecological condition is satisfactory, and the total trend is either static or improving, so see no need for a deferred grazing system as water development alone would help solve distribution.

Respectfully,
Elizabeth Hutchison

My comments on the Ellis Pahsimeroi EIS are directed to the time and way the information was compiled. The reason for the 50% slope theory is myth.

I realize that studies are necessary to have an understanding of one's goals for management tools. On this particular study I feel you have gone out to left field. It seems to me that the study is based on assumption theory, with little fact involved. It also seems that grazing by privately owned livestock is the cause of all problems on BLM land.

As long as I have trailed cattle in the hills, I have found very little erosion and trampling. Sure, the hills are steeper then valleys but that's why they are called hills. If you ever follow cows through the hills, you will find that they pick natural grades which help control erosion. The steepness to the hill does not bother a cow because she just grades herself right up the hill. I don't know of any better way to harvest the natural grass than by grazing. When you stop to think about it, the old cow is a pretty unique machine.

I feel that you are way off base though in the 50% slope theory. It has no place at all in figuring the stabilization of a range. It seems strange when one cannot pinpoint where it comes from. No one will admit to saying it or finding it in any document, but that is what you are basing your reasons for you cut in Camp Creek.

I agree with the other rancher's statement. I'm in favor of a proposal dealing with the individual rancher and solving their problems instead of random sampling of range data.

Respectfully,

Randy Capps

Randy Capps

April 26, 1982

Pahsimeroi E.I.S.

I feel the statement, '50 percent slope unsuitable' has been proven false in many areas and should be thrown out.

If the range is in good condition or showing improvement, there should not be a decrease in A.U.M.'s

After the study of the E.I.S. statements, I feel Alternative 2 would be the best.

Cabin Creek permits

J Rip Tolman

TEXT CHANGES

This section contains all changes and corrections in the text of the Draft EIS.

Page v, List of Tables; Chapter IV - Add after Table 4-4: Table 4-4a "Proposed Grazing Systems on Critical Range of Major Wildlife Species".

Page xi, Summary; Consequences of Proposed Action and Alternatives - paragraph 1, line 11: change "resurces" to "resources".

Page 2-1; Description of Proposed Action and Alternatives: Heading "Proposed Action (Preferred Alternative)", delete "(Preferred Alternative)."

Page 2-1; Description of Proposed Action and Alternatives: third paragraph, delete sentence "The Proposed Action is the Salmon District's preferred alternative."

Page 2-15; Alternative 4: numerous verbal comments asked for clarification of this alternative. Therefore, it was expanded. See the "Preferred Alternative" Section in this book (pages 1 and 2).

Table 2-9; Proposed Action, make the following changes:

Vegetation		
Current total production	-	Delete number
Initial forage allocation Non-consumptive	-	Change 193,649 to 193,609
Visual Resources		
Range Developments	-	Change 2661 to 11,008 Change (less than 1%) to (3%)

Table 2-9; Alternative 1, make the following changes:

Vegetation		
Current total production	-	Delete number
Economics		
Range Improvements	-	Change "No Change" to "174,000"

Table 2-9; Alternative 2, make the following changes:

Vegetation		
Current total production	-	Delete number
Initial forage allocation Non-consumptive	-	Change 193,609 to 195,070
Visual Resources		
Range Developments	-	Change 2661 to 11,008 Change (less than 1%) to (3%)

Table 2-9; Alternative 3, make the following changes:

Vegetation

Current total production	-	Delete number

Table 2-9; Alternative 4, make the following changes:

Soil and Water Resources

Watershed condition	-	Change "121,365 acres (33%) condition improved " to "157,729 acres (42%) condition improved"
		Change "250,936 acres (67%) condition maintained" to "214,577 acres (58%) condition maintained"
Range Developments	-	Change 155 acres to 210 acres
Vegetation Manipulation	-	Change 10,144 acres (2.7%) to 11,480 acres (3%)

Vegetation

Current total production	-	Delete number
Initial forage allocation		
Livestock	-	Change 26,689 to 27,435
Non-consumptive	-	Change 193,609 to 192,863
Expected production increase	-	Change 3% to 10%
Grazing systems		
Rest-Rotation	-	Change 4/43,828 to 9/182,765
Deferred-rotation	-	Change 4/20,083 to 8/48,345
Seasonal	-	Change 3/13,914 to 16/141,196
Range Developments		
Pipelines	-	Change 38 to 48
Troughs	-	Change 41 to 53
Reservoirs	-	Change 13 to 18
Fence	-	Change 37 to 56
Vegetation Manipulations	-	Change 10,144 to 11,780

Cultural Resources

Range Developments	-	Change "7,839 acres (2.1%)" to "9,230 acres (2.5%)
Effects of Grazing	-	Change "63,590 acres (17%)" to "167,651 acres (45%)

Visual Resources

Range Developments	-	Change "54 acres (less than 1%)" to "9,158 acres (2.5%)"

Economics

Range Improvements	-	Change $475,000 to $440,000

Table 2-9; Alternative 5, make the following changes:

Vegetation

Current total production	-	Delete number

Page 3-20; Economics, Introduction, change 1st paragraph to read:

The livestock industry would be the most impacted by the various alternatives. According to the 1980 Idaho Agricultural Statistics, there were 23,500 stock sheep and lambs and 91,000 cattle and calves in the region as of January 1, 1980.

Page 4-9 (Comment 22-2), Wildlife, Terrestrial, Grazing Management; Add above 1st sentence: Proposed grazing systems which would affect critical ranges of major wildlife species is shown in Table 4-4a.

TABLE 4-4a

Proposed Grazing Systems on Critical Range
of Major Wildlife Species

Allotment	Proposed Grazing System	Deer	Elk	Antelope	Big Horn Sheep	Sage Grouse
4401	Deffered	X				
4405	Rest Rotation	X				
4406	Deferred	X				
4407	Rest Rotation	X				
4409	Seasonal			X	X	
4410	Rest Rotation	X		X	X	
4411	Rest Rotation	X		X	X	
4412	Deferred			X		
4413	Deferred			X		
4502	Deferred	X				
4503	Deferred	X				
4504	Deferred	X				
4505	Deferred	X				
4507	Seasonal			X		
4509	Rest Rotation			X		
4510	Seasonal	X				
4511	Rest Rotation	X				
4514	Rest Rotation	X	X	X		X
4515	Rest Rotation		X	X		X
4516	Deferred	X	X	X		X
4521	Rest Rotation	X	X			

Page 4-20; Table 4-5: As a result of changes to Alternative 4 in the Draft EIS, the following changes have been made (no changes in the long-term table).

Table 4-5
Short-Term

Group	1	2	3	4	5	6	Total
Alternative 4	4297	2873	864	10881	5331	3189	27435
% Chg. Act.	-3	-5	-1	+1	-7	0	-2
% Chg. Avg. Annual Income Chg.	-5 -$4296	+1 +$158	+9 +$153	+8 +$4166	+1 +$136	+8 +$6192	+3 +$6509

Page 4-28, Economics; replace existing section with the following:

Approximately $174,000 would be spent on range improvements and land treatments. It is estimated that $31,300 of that would be spent locally. Maintenance of these range improvements would cost $9,000 annually with $6,000 being spent locally. The change in regional net present worth of this alternative would be $0.

Page 4-39, Soil-Water Resources; replace existing section with the following:

Under this alternative approximately 157,729 acres would have slight to moderate improvement. There would be little or no improvement in erosion condition on the remainder of the acreage. This would result in 42 percent of the area improving while 58 percent was maintaining existing condition.

Construction of improvements would cause temporary disturbance of vegetative cover on 210 acres. Vegetation manipulations and vegetation manipulation maintenance would affect 11,480 acres. Total range improvement acres would be 11,690 acres or 3 percent of the EIS area.

Page 4-39 and 4-40; Vegetation/Livestock Grazing changed to read as follows:

Forage Allocation

Initial stocking rates under this alternative would be based on condition and trend of the allotment. This would serve to bring grazing use more in line with inventoried carrying capacity. There would be 27,435 AUMs allocated for livestock grazing, a 544 AUM reduction (1.4 percent) from current active preference. Only 7 allotments would receive grazing reductions (see page 2-16).

As discussed under the Proposed Action, vegetation would benefit from the adjustment in grazing use. At the end of 20 years, AUMs available for livestock use should reach 30,464; an 11 percent increase in vegetative production over initial stocking rate. This means 10 percent greater production, after 20 years, than under Alternative 1.

Grazing Management

Only 11 allotments would be scheduled for intensive management: Findley Basin, Allison Creek, Hat Creek, Falls Creek, Patterson Creek, County Line, Lower Goldburg, Big Creek, Bear Creek, Hamilton Seeding, and Mahogany Creek. Of these, there would be 4 allotments in deferred-rotation (20,083 acres), 4 in rest-rotation (43,828 acres), and 3 in seasonal grazing (13,914 acres). This is 21 percent (77,825 acres) of the grazed acres in the EIS area.

The largest amount of management will be spent on these 11 allotments. Of the remaining 22 allotments not identified above, about 9 will also receive intensive management over the long term.

At the end of 20 years, it is expected that a total of 9 allotments will be operating under rest-rotation (182,765 acres), 8 under deferred-rotation (48,345 acres) and 16 under seasonal grazing (141,196 acres).

Management on the 11 priority allotments will take place on a 5 year schedule. Scheduled management on the remaining 22 allotments will be over a 20 year period. After 20 years, benefits to vegetation would be approaching 87 percent of the Proposed Action objectives.

Range Developments

All range improvement projects scheduled for the 11 allotments discussed above will be implemented on a 5 year schedule. Those not proposed for the 11 allotments, will be completed in the long-term (20 years).

The results, after 20 years would be as follows: 48 miles of pipeline, 53 troughs, 18 reservoirs, 56 miles of fence and 9,320 acres of new vegetation manipulation. Also, 2,460 acres of vegetation manipulation maintenance would be done.

The above mentioned range improvements are necessary for the success of the proposed grazing management systems. As discussed under Grazing Management, benefits to vegetation after 20 years will be approaching 87 percent of the proposed objectives.

Page 4-41, Visual Resources, following text change; paragraph 1, sentence 1: "...54 acres of water development... 112 acres would be effected in the long- term." to "...54 acres of water development... 143 total acres would be effected in the long-term."

paragraph 1, sentence 3 & 4: change the "58 acres" to "70 acres"; and change the "54 acres" to "73 acres".

paragraph 2, change to read: "Twenty-four miles of fence... 24 acres... and 56 miles with 20 years, would effect 67 acres. In the long-term..."

paragraph 3, Change the number "10,144" to "11,780"

paragraph 4, change the following numbers: "8,882 and 10,296" to "8,889 and 11,690".

Page 4-41, Cultural Resources, make the following changes; paragraph 1, line 1: change "7,840" to "11,690" and "2 percent" to "3 percent"

paragraph 2, line 2; change: "...seven allotments (63,590 acres or 17 percent of the EIS area). On three allotments (63,459 acres)..." to "...sixteen allotments (167,651 acres or 44 percent of the EIS area). On seventeen allotments (212,807 acres)..."

paragraph 3, line 1; change: "...71,430 acres or 19 percent..." to "...179,641 acres or 47 percent..."

Page 4-42, Alternative 4, Economics; change first sentence under Rancher Income to read: In the short-term this alternative would have an annual income gain of $6500.

Rancher Income: Change table number at the end of paragraph from Table 2 to Table 4-6.

Range Improvements: Change existing numbers ($475,000; $84,000; $29,000; and $17,000) to the following numbers ($440,000; $78,000; $19,000; and $11,000) respectively.

Change sentence under Secondary Income Impacts to read: In the short-term the secondary income changes would amount to an additional gain of $2900. In the long-term...

Page 4-43, Alternative 4, Economics; change paragraph under Summary to read:

Rancher income would increase by $6,500 in the short-term, $17,000 in the long-term. Range improvements would cost $441,000 with $78,000 spent locally. Maintenance costs would be $19,000 annually with $11,000 spent locally. Secondary impacts would increase income by $2,900 in the short-term and $5,200 in the long-term. Employment would increase by one job in the short-term and three jobs in the long-term. No impact would occur on ranch consolidation. In the short-term, capital position would be worsened for most permittees. The regional net percent worth would be $418,000.

Table 4-7, Alternative 4

Short-Term Use

First paragraph change: "26,289" to "27,435" and "1,290" to "544"

Third paragraph change: "8,882" to "8,889"

Forth paragraph change: "6" to "7"

Long-Term Productivity

Change: "11.5" to "11" and "29,764" to "30,464"

Irretrievable

First paragraph change: "67" to "59"

Second paragraph change: "19" to "47"

Page B-6, Appendix B; Table B-3, change: "Pounds per acre" to" pounds per month".

Page R-1, References; add: Heady, Harold F. 1961, Continuous vs. Specialized Grazing Systems: A Review and Application to the California Annual Type. J. Range Management 14(4): 182-193

Page R-3, References; change: "Tisdale, E.W and M. Hirovaka" to "Tisdale, E.W. and M. Hironaka".

Map 2-2; Legend - Change: "Crooks Canyon Wildlife Area" to "Cronks Canyon Wildlife Area."

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